



Dhalia Real Estate Academy

Quality Assurance Policy

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1. Purpose of this document

1.1 Aim of the QA process

Internal Quality Assurance (IQA) is the process of ensuring that training delivering and assessment practices are monitored in order to ensure that they meet national standards.

The Quality Assurance policy has been designed specifically to ensure continuous quality improvement at Dhalia Real Estate Academy, a department set up within the overriding structure of Dhalia Real Estate Services Ltd. and it aims to guide the Academy through the required processes of national accreditation both at the Department and course level.

It is pertinent to note that Dhalia Real Estate Academy only caters for the training of new recruits who intend working as Real Estate Agents / Managers with Dhalia Real Estate Services Ltd. The Academy could be considered as an internal service being provided for such people and in this respect does not recruit its own trainees but its assigned trainees from the Human Resource Department who are responsible for the recruitment and selection process within Dhalia Real Estate Services Ltd. No fees are charged to trainees and hence no revenues are generated, hence the Academy does not produce its own set of Accounts. It is considered as a cost centre operating under an allocated budget generated by Dhalia Real Estate Services Ltd's Finance Department.

The Human Resource Department, led by the Human Resource Executive assumes the responsibility to perform tasks related to what could be considered as "external checks", and is responsible for organizing quality checks (content level checks).

Quality Assurance at Dhalia Real Estate Academy sets out to ensure the same high quality for all its courses (accredited and non-accredited). This is done by addressing a variety of fields, such as the academic content of courses, admission of trainees, administrative and trainee support, among others. The aim is to use efficient processes and services to support the quality assurance culture at Dhalia Real Estate Services Ltd.

2.0 Strategic Intent

2.1 Vision

To be respected and appreciated by our customers for the outstanding quality of our work, creativity, helpfulness, and the effectiveness of our training programs

2.2 Mission

Our Mission is to provide Quality Career Training and Skill Development in order to encourage and motivate Trainees in pursuit of their careers. We believe that those who are well trained are ready to be successful Real Estate Agents / Managers.

Dhalia Real Estate Academy offers a unique training experience for self-employed Real Estate Agents / Managers who wish to explore the property industry.

We pride ourselves not only on our professional, thorough, warm and sometimes fun approach to training but also the fact that our trainers are extremely passionate about helping to produce exceptional quality Real Estate Agent / manager experts that have the confidence and ability to serve clients with exceptional service and knowledge.

2.3 Goals

- The Primary Goal of the Academy is to train the career minded individual and offer an education that will develop people into responsible individuals, enabling them to obtain the Real Estate Agent / or Manager practitioner license to operate legally within the Real Estate Industry where they will be able to apply their knowledge in practical situations to the benefit of customers.
- To provide a continuous check on the consistency and quality of delivery and the consistency, quality and fairness of marking, grading and overall assessment of student's work.
- To meet and exceed the requirements placed upon the Academy by NCFHE, the licensing body.
- To ensure that the Academy's practices are consistent across all training courses and for all participants.
- To identify the Academy's strengths and the areas requiring development and to use this to inform the process of continuous improvement.
- To support trainers in the classroom delivery by affording them the opportunity to receive critically supportive comments.

2.4 Training Philosophy

To best address our mission, the Academy's training philosophy has some key components.

- We are not a public training Academy. Our role is solely dedicated to train new recruits who join Dhalia Real Estate Services Ltd with the intention of working as Real Estate Agents or Branch Managers
- We are committed to have a workforce prepared to meet current and future business objectives by providing our Estate Agents and Branch Managers with appropriate education and training opportunities
- We are committed to defining clearly the minimum training requirements which are related to the role of an Estate Agent and Branch Manager, their responsibilities, including customer satisfaction
- All new Estate Agents / Branch Managers will be oriented in the philosophy, ethics, values, principles and business priorities of the company within the first four months of their engagement
- Our Branch Managers will successfully complete managerial knowledge and skills training to properly coach and motivate the Agents that report to them

We are also committed to:

- Make all of our trainees' activities meaningful – whether as a form of personal or professional development. All of the milestones for student progress are designed to be “value-added” to their education.
- Ensure that our training is geared directly toward the skills and capacities our trainees will need to compete and succeed professionally in the Real Estate Industry.

To these ends, we seek to ensure that trainees gain understanding of the Real Estate Industry through the required lectures, coursework and fieldwork. Our trainers are actively

involved in the Industry. Our trainees receive numerous opportunities in and outside of their classes to practice those professional activities that best prepare them for professional work: such as: carrying out inspections, prospecting for clients, searching for properties and delivering a sales pitch. We also offer numerous opportunities for new recruits to learn from other more experienced Agents in the branch network, through interaction and site visits with them. All of these activities contribute to our new recruits (trainees) growth personally and as budding Real Estate Agents / Managers.

3.0 Responsibilities

At Dhalia Real Estate Academy, the authority for monitoring the quality of programs resides with the Head of School (The Chief Executive Officer of Dhalia Real Estate Services Ltd), who delegates the responsibility to the Human Resource Department.

The Human Resource Department (within Dhalia Real Estate Services) assumes overall responsibility for the Academy's Quality Assurance. The Department consists of a Human Resource Executive, a HR Executive Assistant and a Trainer.

The following boards and Teams are also involved in the quality assurance process:

- The **Board of Directors** consists of the Executive Chairman, the CEO and the Financial Controller. Regular Board of Directors meetings are scheduled. In these meetings the Board of Directors team will report on the strategy progress.
- The **Senior Management Team** meets weekly and oversees, apart from other areas of company business, all education related activities and issues; it gives recommendations for quality improvement on operational and strategic levels. The Senior Management Team is composed of the Head of Marketing, the Head of Business Development, the Head of IT, the Head of HR, the Financial Controller and the company CEO.
- The **Complaints Service Point (The HR Executive Assistant)** is the central contact point where trainees can submit their objection or formal complaint, both for academic and non-academic complaints. Cases are dealt with confidentially. All complaints are investigated and a written response provided to the complainant. Trainees are advised of the complaints procedure during induction training. Any compliments or complaints are used to inform the feedback process.

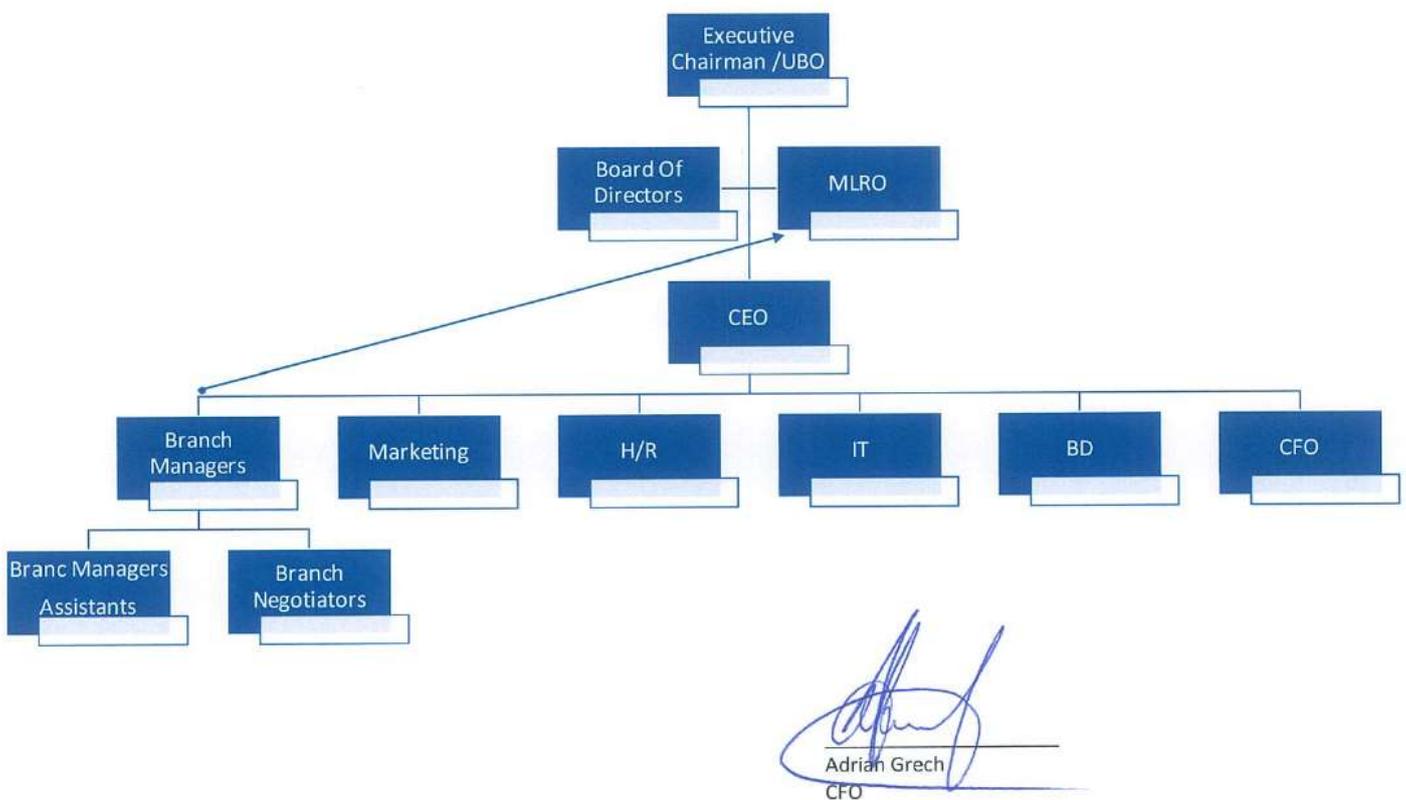
The complaints procedure is set out in the Employees Handbook (Appendix II):

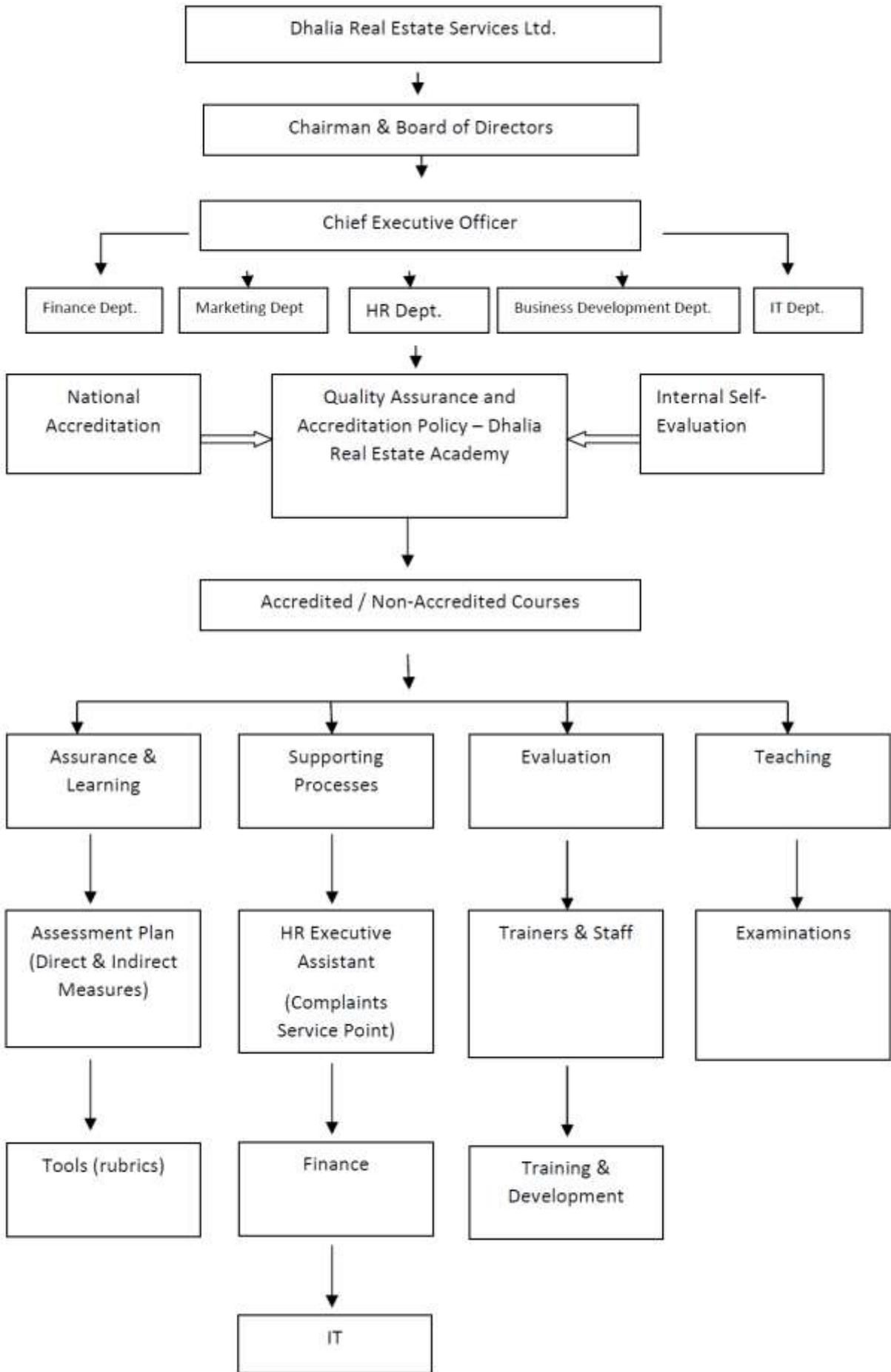
COMPLAINT & APPEAL POLICY

Any student attending the Training Academy wishing to file a complaint against any part of the training program, whether logistic, materials used or tutor concerned, should send the complaint in writing to the HR Department. The HR department will immediately investigate and handle the complaint, and reverts with any feedback and / or decisions to the student concerned. If the student is still not satisfied, an appeal can be filed with the Head of the Academy / CEO.

4.0 The implementation of QA

The chart below illustrates the guiding forces of the Quality Assurance processes at Dhalia Real Estate Academy and it also shows how it is linked and managed at the Company (Dhalia Real Estate Services) level.





Dhalia Real Estate Academy is structured as a specialized unit within the Human Resource Department of Dhalia Real Estate Services Ltd.

The Academy has created its own internal self-assessment procedure to ensure continuous improvement.

The Academy is a cost centre as it does not generate revenues and hence depends on the supporting functions and services from the Human Resource Department, Finance Department and IT department from Dhalia Real Estate Services Ltd.

Specifically, the Human Resource Department is responsible to recruit potential Real estate Agents who will then be transferred to the Academy for Training in order to be able to register for the Real Estate Agent License to be issued by the Regulator.

The Finance Department is responsible to ensure that there is an adequate budget allocated to the running of the Academy and the IT Department is responsible to ensure that all IT systems are functioning, specifically, Internet, email, the company database as well as all hardware and supporting software used at the Academy

As part of its mandate it is set up to ensure that learning actually takes place and hence, the need for the Quality Assurance Policy. Learning will also be assessed through formal examinations, Assignments, Fieldwork and roleplays. Results obtained on the job and feedback received from Branch managers will also be used as indirect measures of trainee learning.

Assessments will be regulated for fairness and consistency through the use of rubrics.

So the QA system will evaluate both trainees and trainers. The latter being assessed by the trainees and used as feedback as an input to the continuous improvement cycle to enable the enhancement of the Training and career development of the company's Real Estate Agents / Managers.

Learning will take place through a variety of teaching methods such as: classroom training, computer work, and fieldwork

5.0 QA Process

5.1 QA at Corporate and course levels

The details below illustrate how QA is embedded at the corporate and Academy (course) level.

5.1.1 QA at Corporate levels

Implementing QA at the corporate level:

- Clear mission and strategy
- Clear organization structure with responsible areas within the HR Department for assessing, feedback loops and necessary improvements (with action points) related to the Academy's role
- Trainers have clear classification of their tasks for contributing to the course development and to the quality improvement cycle
- Clearly structured recruitment procedures
- Trainee and stakeholder focus.

5.1.2 QA at Academy (Course) levels

Implementing QA at the Academy (course) level:

- Careful attention to curriculum and course design and different modes of delivery;
- Recruitment, external and internal relations;
- Regular periodic review of course
- Regular feedback from Branch Managers, customers and the labour market;
- Participation of Trainees in quality assurance activities;
- Defined measures to improve the quality of the course.

5.2 Tools for feedback and information:

- End-of-program satisfaction questionnaire;
- 3 month review with Trainee
- Feedback from Branch Managers
- Outcomes assessment plan(s) and its result(s);
- Trainer evaluation;
- Course evaluation.

The Academy continues to explore the best systems and tools to make the process more effective.

6 Mechanisms of QA

6.1 General QA procedure

- 1) We ask trainees to provide feedback on the teaching, learning and assessment they receive. We use this information to inform our management planning and to introduce improvements where they are practicable. We invite feedback from trainees on how we might improve during each progress review.
- 2) We produce written statements of our policy in key areas including equality, diversity and inclusion, information advice and guidance, confidentiality, acceptable use of technology and e-safety and CSR as part of Dhalia Real Estate Services Ltd Policies. These policies are formally reviewed on an annual basis and up-dated as necessary to ensure they remain current and accurate.
- 3) We operate systems and procedures for the key training process. We carry out internal quality sampling of documentation to check that systems are being consistently followed and records are up-to-date and accurate.
- 4) We collect data on recruitment, retention, achievement, training and progression and analyse it in order to identify trends within the workforce. If these areas are not improving we try to find out why and identify corrective action.

Hard copies of all data is kept at Head Office / the Academy for a period of five years. These are kept locked and access to them is be restricted to authorised personnel. After that, the records are transferred to the company's archives, which are presently located at the company's offices in Fgura, for a further period of 10years. Access to these is also restricted to authorised personnel. The records are also be filed electronically in encrypted form with password access on the company's servers.

This procedure will be enhanced by filing all data also on the cloud for a period of 40 years.

- 5) Feedback from external quality assurance activities is acknowledged and used to improve assessment and quality assurance practice.
- 6) We carry out appraisals of each employee / self-employed Estate Agent / Manager on an annual basis against the requirements of their job description. A staff development action plan is agreed for the forthcoming year which identifies training needs (Non accredited training courses).
- 7) We produce a self-assessment report every year which looks at the training we provide against the standard laid down by the accrediting body (NCFHE). This involves all our HR Department staff, and takes into account feedback provided by trainees, organizational performance, the observation of teaching, learning and assessment, compliments and complaints, as well as feedback from external quality auditors. We identify our strengths and weaknesses and draw up an action plan designed to take steps towards addressing these. We monitor implementation of these action plans as part of our commitment to on-going quality improvement.

6.2 Regular evaluation at course level

Regular evaluation of the course takes place at several levels.

- The intended learning outcomes are measured at course level by direct and indirect measures.

Direct measures include assessments at the end of each module to assess the level of understanding that a participant has had on the subject. The grades will be examined individually and the average grade of the whole group will also be taken in consideration.

Indirect measure include a survey at the end of each course where respondents would be asked to evaluate if the course met their expectations and also to comment on the subject matter, the tutors and also the facilities provided during the course.

Successful participants for the course would be working with Dhalia Real Estate. All consultants resigning for their role with Dhalia, whether they resign during the course or after, are asked to attend for an exit interview to examine the reason for their resignation. During the exit interview, participants would be asked about the training they had attended, especially the accredited course.

- Course evaluation takes place after each module throughout the program;
- A test is taken at the end of each module and the results from this by individual participants as well as the pass / failure and average mark will be examined to evaluate the module and its delivery. Students will also be asked to complete a questionnaire at the end of the course with questions asked about the course content, material and delivery. The curriculum is evaluated annually by Trainers, Branch Managers, and Senior Management

- Trainers are evaluated annually.

Trainers will fill in a self-evaluation form. This, together with the questionnaire filled in by participants at the end of the course and dealing specifically with the delivery by the trainers, will be examined by the Head of the Academy and the HR Executive. The HR Executive Assistant (the Complaints Service Point) will also be consulted to see whether any complaints have been received about a particular trainer. An interview with the trainer is also held to discuss any issues that might arise from this exercise.

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More details about these interlocking control cycles follow the basic *Plan, Do, Check, Act* logic:

Plan

The course is defined in terms of:

- Course level Intended Learning Outcomes, focusing on Real Estate competences (in terms of Dublin descriptors);
- Course structure, module outline and allocation of credits;
- Definition of didactical philosophy.

Do

- The changes and improvements of the course are discussed between the HR Executive, Head of School (Company CEO) and company Trainer
- The HR Executive (Academic Coordinator) revises the content of the course outline and communicates necessary arrangements with teaching staff involved in the delivery of the course;

All necessary arrangements will be communicated by memos issued by the HR Executive / Head of the Academy as well as ad hoc meetings held by the HR Executive / Head of the Academy with all teaching staff.

Check

A number of instruments are used to assess the course.

- An overall Satisfaction Questionnaire is carried out at the end of each course by all trainees.
- HR keeps records of Trainees grades. This data is compared with the Learning Outcomes (LOs), and the results are analyzed and discussed as part of the direct measures to assess the overall performance;

Act

- The information from the overall course satisfaction questionnaire is analyzed and discussed with the HR Executive. The non-academic issues of the course are discussed with the company CEO
- The information measuring the intended learning outcomes assessments is discussed with the HR Executive
- Action items are discussed in the Trainer Meeting and finally ratified by the CEO
- As a result, the course can be adjusted both at the content and the operational levels. This requires coordinated actions from the HR Executive , the trainers and the staff involved at the operational level;
- The overall questionnaire is reviewed and revised (if necessary) by the HR Department
- The improvements in the course are implemented by the HR Executive.

6.3 Regular evaluation at module level

Plan

- A module outline is drawn up on the basis of the profile of that module contained in the overall program;
- The module is scheduled in the course according to its function in the curriculum and its logical relations with other modules;
- A trainer is assigned to the module on the basis of general (program dependent) and specific (subject dependent) qualifications required;

Do

- The trainer communicates all relevant information, including the module outline to the trainees; Prior to the commencement of the course, the trainee will be provided by a hard and soft copy of the course outline, the reading material, details of venue etc.
- The module is taught according to the plan, additional agreements and the schedule;
- Trainees do their graded assignments, practical sessions and exams

Check

- The exams, practical sessions and assignments are graded as described in the module outline and reported in agreed- upon formats, so as to provide transparent feedback to the trainees;
- Trainee evaluations of the module show their opinions on a broad range of module-related issues, including the perceived degree to which the learning goals have been attained;
- The trainer is required to fill in a document in which he/she evaluates the module in general, the degree to which learning goals have been attained, the grades and other relevant aspects of the module;

- The specific information from the overall course satisfaction questionnaire regarding the courses and the different segments of the curriculum is analysed and discussed as input towards recommendations for upgrades to the various course modules.

Act

- Decisions on course-level changes, if relevant to the specific module are translated into necessary module changes;
- The module outlines are evaluated and adapted to include the necessary changes.

7.0 Criteria for Selecting Internal Trainers

1. Excellent experience with both the content/subject-matter area of what she or he will be teaching and with the organization. This means that each selected trainer is viewed as someone who performs well and also has a strong conceptual understanding of the job and the organization.

2. Is passionate about and committed to what she or he will be teaching. The potential trainer must believe in the content of the training and be determined to demonstrate the value of what the trainees will be required to master.

3. Readily appears credible to trainees. To make training work, the trainees must perceive the trainer as a role model – someone to emulate. The credibility of the trainer transfers to credibility and desirability of content for those being trained

4. Possesses a strong and empathetic understanding of the trainees, including their characteristics, their concerns and the obstacles they encounter in mastering what is being taught. This translates into the trainer being “trainee-centered” as opposed to content-centered. The focus is on the trainees as they are, and not as some ideal should-be. The trainer is aware of what it takes, intellectually and emotionally, to move from a current state of competency to a desired end goal. This does not eliminate rigor or demand for high performance. These remain, but within an atmosphere of support, encouragement and patience to foster success.

5. Possesses excellent facilitator characteristics. These include: An ease in managing groups; an ability to draw out thoughts and ideas from others; a facility to synthesize what others say so as to make it meaningful for all; an ability to direct the flow of information input from a group, encouraging free expression, but in a coherent and integrated manner; a facility to bring discussion to a close, tying all useful elements together.

6. Is able to manage time while still being attentive to trainees' interests and needs. Time management is an essential quality of an excellent trainer. This means that the potential trainer not only gets the trainees to meet all of the training objectives but does it in a way that makes the learning pleasurable and meaningful – effective process and outcomes.

7. Is passionate about achieving learning success. This is evidenced by a desire to have every trainee succeed. The potential trainer understands that her or his success is based on the success of the trainees. The reward for the trainer is the joy that comes from how well the trainees, through the trainer's guidance, can demonstrate performance.

8. Has the ability to maintain order and control without creating a constrained atmosphere. An excellent trainer conducts training in an atmosphere of openness and conversational dialogue with the trainees. Nevertheless, at all times, the trainees are aware that there is a schedule to follow and that productive activity is the priority.

9. Can demonstrate flexibility and imagination in order to breathe life into the learning activities. Each group has its own personality. Although the activities in a course or program are standardized, the ways they are presented and executed require adaptation to the trainees' backgrounds, levels of competency and work contexts. The trainer must take these into account in presenting, guiding and debriefing the learning activities in which the trainees engage.

10. Present a neat, professional, organized and ethical image. The trainer is the representative of the organization. The appearance and manner of the trainer, including how she or he expresses ideas or presents examples reflects on the organization. Trainees are quick to emulate role models.

11. Trainers must also possess the necessary academic qualifications as well as required experience related to the specific requirements of the course / module they will be responsible for.

8.0 The IQA Standards

For successful quality provision and learning environments, the Institute's IQA system is linked to the eleven standards for quality assurance. These standards form the basis of the peer review process and incorporate the expectations of the National Quality Assurance Framework for Further and Higher Education.

The standards for internal quality assurance are:

1. Policy for Internal Quality Assurance
2. Institutional probity
3. Design and approval of programmes
4. Student-centred learning, teaching and assessment
5. Student admission, progression, recognition and certification
6. Teaching staff
7. Learning resources and student support
8. Information management
9. Public information
10. On-going monitoring and periodic review of programmes
11. Cyclical external quality assurance.

8.1 Standards for internal quality assurance Policy for quality assurance

Dhalia Real Estate Academy will adopt this Quality Assurance Policy as its official training policy. This Quality Assurance Policy is approved by senior management and the quality culture permeates throughout all departments and functions of Dhalia Real Estate Services Ltd, the training, hence including the training Academy.

The quality assurance policy is regulated by the internal stakeholders of the company and implemented through appropriate structures and processes as explained in this document.

The following text will be included in the next update on the company's website.

Dhalia Quality Policy

Dhalia believes that its market expects a continually improving service. We aim to continually improve the service we provide to meet our clients' requirements and to provide services that we can justifiably be proud of. Only by providing an outstanding service and product quality will we achieve our aims of long-term success and sustained improvements.

Our Quality Policy is defined and strongly driven by the following management principles and behaviours:

- Build a mutually profitable relationship with our customers, ensuring their long-term success, through the understanding of their needs and the needs of their customers as well
- Achieve our commitments for quality, cost, and schedule
- Enhance the systematic research and use of best preventive practices at all levels and ensure reliable risk management
- Drive continual improvement and innovation based upon efficient business processes, well-defined measurements, best practices, and customer surveys
- Develop staff competencies, creativity, empowerment and accountability through appropriate development programs and show strong management involvement and commitment

All personnel within the company are responsible for the quality of their work. The company provides training and has established systems to assist all personnel to achieve the standards required. While we endeavour to offer a service that we can be proud of, we have to recognise that we don't always achieve our own standards. When a customer complains, we are committed to investigating the complaint and will do our best to put right all justified complaints.

Dhalia strives to be the best provider of real estate services in the industry. Through the use of these guiding principles, everyone in Dhalia is accountable for fully satisfying our customers by meeting or exceeding their needs and expectations with best-in-class solutions and services. Our goal is 100% customer satisfaction 100% of the time.

The policy specifically includes:

- a. the organisation of the quality assurance system;
- b. the responsibilities of management, departments, trainers & trainees with respect to quality assurance;
- c. procedures for ensuring academic integrity
Any assignments which students have to do are checked against plagiarism using online checkers. Acceptable plagiarism is 15%, any more than that is penalised. Assignments with more than 25% plagiarism are given no marks.
- d. procedures for ensuring against academic fraud

Any student who is caught conducting academic fraud in any exam or assignment would be expelled and his engagement with Dhalia terminated.

e. procedures for ensuring against intolerance of any kind or discrimination against the trainees or staff;

Policy 19.0 in the Dhalia Employee Handbook (Appendix II) deals with Harassment, which is not tolerated. All trainees and staff are to report any form of harassment to the HR Executive Assistant for the appropriate measures,

f. the involvement of external stakeholders in quality assurance;

The Head of the Academy together with the HR Executive / Trainer will ensure that any external tutor at the academy would adhere to this quality assurance, with respect with their qualifications and mode of delivery. Any assessments would be done under the supervision of the Head of the Academy.

g. procedures for the quality assurance of any elements of an entity's activities that are subcontracted to or carried out by other parties;

Any subcontracted activity would be done under the supervision of the Head of the Academy / HR Executive / Trainer to ensure that the quality assurance of the academy as set out in this policy is maintained.

8.2 Institutional probity

As stated earlier, the Academy should be considered as a cost centre within the overall financial structure of Dhalia Real Estate Services Ltd. As such, the Academy will not be producing its own financial statements, however a list of costs associated with running the Academy will be produced annually. Dhalia Real Estate Services Ltd. does produce annual audited financial statements as well as an annual budget plan. The Academy has also ensured that members of the body corporate, the legal representative and the persons occupying a headship position are fit and proper persons to deliver further and/or higher education programmes. This has been secured through the fact that these said people are also the representatives of Dhalia Real Estate Services Ltd and the selection criteria for the Head of School. The Head of the Academy must hold a minimum Level 7 in a subject related to Real Estate, Education or Management. A minimum 5 years experience in a senior management post in a real estate company or an educational institution is also required.

8.3 Design and approval of programmes

The Academy has processes in place for the design and approval of their courses and have the following characteristics:

- a. Student workload is defined in terms of ECTS learning credits;
- b. The target audience and the minimum eligibility and selection criteria are clearly defined
- c. Courses are learning outcome-based, distinguishing between knowledge, skills and competences;
- d. The courses include appropriate learning dynamics and a measure of tutor-learner interaction (small groups / Q&A sessions / Practical sessions)
- e. Appropriate manpower resources (tutors and staff) as well as physical resources (classroom, computers and projection equipment) as well as forms of assessment have been catered for.
- f. Minimum requirements in terms of qualifications and competences for teaching staff have been defined as follows:

The generic profile of trainers will be people that have worked or are working in the Real Estate Industry. Exceptions will be made where specific topics might need to be covered such as: legal issues, financial issues where direct experience in the Industry is not required.

In general, the Minimum Qualifications required:

Level 5 certification in a related subject (HR, Sales & Marketing, Finance, Law)

5 years work experience in the Real Estate Industry.

- g. The Academy is in line with the MQF and the Malta Referencing Report 2012 and subsequent updates;
- h. A process for the identification of training/ programme needs that involves the participation of external stakeholders such as customers, architects, lawyers and notaries who are likely to benefit from the outcomes of such provision has been catered for by seeking their feedback with respect to new developments in the industry as well as feedback on the performance of the company's Estate Agents.

The training programme has always to take in consideration the requirements set out by the Real Estate Agents, Property Brokers and Property Consultants Act, 2020 which requires that the training programme would have as its subject matters the legal, financial, technical and communication issues relating to real estate as well as its marketing and sales. Feedback from external stakeholders would include periodic satisfaction surveys sent out to clients and also periodic individual meetings with a select number of architects, lawyers and notaries.

- i. Trainees are also included in the design and review of training by seeking their feedback during the training period and later when they are "on the job" to reflect back on their training program
- j. Modules with the courses are designed so that they enable smooth trainee progression in understanding the Real Estate Industry

8.4 Student-centred learning, teaching and assessment

The course is delivered in a way that encourages trainees to take an active role in creating the learning process. This is achieved by the personalisation of training, moving at the learners pace, responding to Q&A sessions and allowing trainees to develop their own style and approach to the Real Estate Industry as long as their style is governed by Dhalia Real Estate Services Ltd's. The assessment process, being a blend of assignments, exams, practical sessions and multiple-choice allows the trainees to respond differently and uniquely.

The implementation of trainee-centred learning and teaching is designed around the following principles:

- a. The respect and attendance to the diversity of trainees and their needs, enabling a degree of flexible learning paths; (demonstrated in the way part-time trainees learn)
- b. Training consists of different modes of delivery (lecture, practical, computer work)
- c. Training is also designed in a flexible way using a variety of pedagogical methods;
- d. Training is regularly evaluated and the modes of delivery and pedagogical methods adjusted based on the feedback and improvement points raised;
- e. Full learner autonomy is embedded in the learning process, however coaching and guidance by tutors and branch managers is embedded within the training process.
- g. Training is based on an understanding of mutual respect within the learner-trainer environment in an adult learning environment.

Assessments take the following points into account:

- a. Assessors are familiar with existing testing and examination methods and receive support in developing their own skills in this field;
- b. The criteria for and method of assessment as well as criteria for marking are communicated to the trainees in advance of the start of each module
- c. The achieved learning outcomes are analysed in relation to the intended outcomes. This is mainly done through the results obtained and trainee feedback. Trainees are also given personalised feedback on their results.
- d. Assessments will be carried out by the tutor responsible for the module and sample checked by the HR Executive. In the case where the HR executive is responsible for the module, sample checks will be carried out by the Head of School.

- e. Students will have a right to appeal against a grade, provided a motivated reason is given for such objection and their paper will be reviewed by the HR Executive or the Head of School accordingly
- f. Assessments are consistent and fairly applied to all trainees and carried out in accordance with the stated procedures;
- g. A formal procedure for student complaints and appeals is in place. The complaint procedure is included in the Employees Handbook and states:

COMPLAINT & APPEAL POLICY

Any student attending the Training Academy wishing to file a complaint against any part of the training program, whether logistic, materials used or tutor concerned, should send the complaint in writing to the HR Department. The HR department will immediately investigate and handle the complaint, and reverts with any feedback and / or decisions to the student concerned. If the student is still not satisfied, an appeal can be filed with the Head of the Academy / CEO.

8.5 Student admission, progression, recognition and certification

As Dhalia Real Estate Academy will only cater for new recruits joining Dhalia Real Estate Services Ltd, the Academy will only publish and communicate regulations, course outlines, assessment procedures etc., with such people. Admission procedures are included in Appendix I - Human Resource Management: Strategic Policy Document, made public through marketing channels used by Dhalia Real Estate Services Ltd.

- a. Admission processes and criteria are implemented consistently and in a transparent manner and managed by the HR department of Dhalia Real Estate Services Ltd. As all consultants has to have a licence, a new recruit presenting a certificate from an accredited institution which would enable him to apply for the licence would not be obliged to attend this accredited course, but would have to only attend Dhalia's Induction Course, which course is not accredited.
- b. Induction to the Academy and the programme is provided upon recruitment and on the first day at the Academy; Induction will also cover specific details such as the history, the management team and the employee handbook of Dhalia Real Estate Services Ltd. This Induction does not form part of the course for which we are applying for accreditation.
- c. Processes and tools are in place to collect, monitor and manage information on trainee progression;

During and at the end of the training, the Trainer would give feedback on the student to the Heado of the Academy / HR Executive. Regular feedback on the consultant while working in the office is also obtained from the manager to whom s/he reports.

- d. On successful course completion trainees receive a Certificate with the following information:

- a) License number
 - b) Category according to the Second Schedule: Further Education Institution
 - c) The accredited status of the course Further Education Programme;
 - d) The MQF/EQF level for programmes provided at the Institution: “MQF/EQF Level 4”;
 - e) The number of ECTS/ECVET points, for example: ‘Learning Points: 8 / 12’
- e. On completion of the course trainees will apply for their Real estate Agent / Manager licence with the regulator

8.6 Student admission, progression, recognition and certification

The Academy assures the Regulator of the competence of their teaching staff. The Academy applies clear, fair and transparent processes for the internal recruitment, conditions of employment and professional development of such staff. The Academy makes every effort to promote innovation in teaching methods, and continuous professional development as well as kept up to date with developments in the Real Estate Industry.

The generic profile of trainers will be people that have worked or are working in the Real Estate Industry. Exceptions will be made where specific topics might need to be covered such as: legal issues, financial issues where direct experience in the Industry is not required. In general, the Minimum Qualifications required:

Level 5 certification in a related subject (HR, Sales & Marketing, Finance, Law)

5 years work experience in the Real Estate Industry.

Staff are encouraged to continue their professional development and supported by given enough time and also encouraged to attend seminars and other relevant courses. The company pays for seminars and courses if it deems that this would be of benefit to the member of concerned in the performance of his / her duties.

8.7 Learning resources and student support

The Academy has appropriate funding for learning and teaching activities. This funding is provided and catered for in the annual budget drawn up by Dhalia Real Estate Services Ltd. The Academy has adequate and readily accessible learning resources that are provided to assist our trainee learning. These resources take the form of physical facilities, computer equipment, tutors, managers and support staff. The Trainer, who is in charge of the Academy, puts requests for additional resources to HR Exdcutive / the CEO. Once these are approved, Trainer is informed accordingly. Once such request are approved, the process of acquiring these additional resources starts. Decisions on tutors, managers and supporting staff is taken by the Senior Management Team.

All resources and services are fit for purpose and accessible, and trainees are informed about the services available to them when they join the Academy.

All resources are regularly reviewed to see whether there are any additional needs to add / replace any. The Trainer who is in charge of the Training Academy will be responsible to see that this is being regularly monitored.

At the commencement of their training at the academy, trainees are given a booklet outlining details about the course content, the relevant MQF level and number of ECTS, details about the complaints procedure and the facilities and support that are available at the academy.

8.8 Information management

The Academy collects, analyses and uses relevant information for the effective management of its training course(s)

The main information collected and analysed are the trainees survey forms at the end of the course, the grades obtained in the tests / assessments and the self-evaluation done by the tutor at the end of the course.

This information includes:

a. Profile of the trainee population

A profile of the trainees is kept by the HR Department as per the section 29 of the Employees Handbook (Appendix II).

b. Course participation, retention and success rates;

No data is presently kept on the participation rate of any group, however, section 26 of the Employees Handbook (Appendix II) states:

It is the policy of Dhalia to provide equal opportunity for all qualified persons and not discriminate against any consultant / employee or applicant for employment because of race, color, religion, sex, age, national origin, disability, or any other protected status in accordance to local legislation.

This policy applies to recruitment and placement, promotion, training, transfer, retention, rate of pay and all other details and conditions of employment.

Employment and promotion decisions will be based on merit and the principle of furthering equal opportunity. The requirements we impose in filling a position will be those that validly relate to the job performance required.

Records are kept on the number of participants who attended the course, the number of them resigning prior to the completion of the course and the results of all assessments. These records are kept in hard and soft form and retained for 41 years stored on the cloud.

c. Trainee' satisfaction with their course; At the end of the course, all trainees are asked to fill-in a satisfaction questionnaire which is then passed on to the Head of the Academy and HR Department.

d. Retention rate with Dhalia Real Estate Services Ltd. rates and career paths.

The HR Department keeps records of the retention rate of all staff and their career paths while working with Dhalia.

Data collected on the trainees' satisfaction, retention rates and career paths are discussed and analysed by the senior management team in the meeting prior to setting the following year's budget plan.

It is important to note that a number of the above are collected and stored at the Human Resource Department at Dhalia Real Estate Services Ltd. Head Office.

All data will be collected by the HR department and will be analysed by the HR Executive. This analysis will be used in the review of the courses and academy that is done periodically.

8.9 Public information

As the Academy is set up to cater for internal recruits with Dhalia Real estate Services Ltd., the Academy feels that there is limited information that can be made public due to the competitive nature of the Industry.

Prior to the first interview, all applicants would be provided with the minimum requirements needed to work with Dhalia and attend the course.

On their first interview, applicants will be provided by a booklet listing the course details, the learning outcomes of the course, the MQF level and number of ECTS and the complaints procedure.

The Academy or Dhalia Real Estate Services Ltd will make the following information public:

a. the selection criteria for the courses (Entry requirements to work as an Agent with Dhalia Real Estate Services Ltd.)

The Marketing Depart. works in close collaboration with the HR Dept. to ensure that all information given to the public is kept up-to-date.

b. the qualification being awarded, including information on the EQF/MQF level and ECTS/ECVET learning credits;

8.10 On-going monitoring and periodic review of programmes

The Academy implements the Quality Cycle by monitoring and periodically reviewing its course(s) in terms of their IQA policy and standards.

Periodic reviews of the end of course questionnaire and the grades obtained are made by the Head of the Academy and HR Executive to see whether any changes are necessary.

The objectives of this exercise are:

a) To ensure the Academy is achieving its set objectives

- b) To review the content of the course in the light of latest research/practice in the Real Estate Industry to ensure that the course is up to date; and
- c) To respond to the changing needs of trainees and society.

Such reviews include input from trainees and input from EQA reports as well as Branch Managers and customers who are benefiting from the outcomes of the course.

Trainees views are mainly taken by the end of course questionnaire while managers are asked to send feedback on any training needs that their staff needs. HR Dept. also makes a 6 monthly appraisal of all staff through personal interviews where training needs are also explored.

These reviews lead to continuous improvement of the course. Any action planned or taken as a result is communicated to all those concerned.

Any actions taken is communicated to all staff through memos sent to all. The Head of the Academy and the Trainer will ensure that any changes done to the course which differs in substance from the accredited course are only implemented after the relevant re-accreditation.

8.11 Cyclical external quality assurance

Dhalia Real Estate Academy shall undergo external quality assurance by, or with the approval of, the NCFHE on a cyclical basis according to NCFHE guidelines, once every five years.

9.0 Monitoring and Evaluation

This QA policy will be monitored by the HR Executive / Head of the Academy through established quality audit procedures. Where discrepancies are found, or evidence of malpractice or maladministration are found, then appropriate policy will be initiated by the Head of School (Dhalia Real Estate Services Ltd. CEO)

All of these aspects are drawn together by the Trainer in the role of overall Quality Assurance Manager. Analysis of current performance leads to action planning, action planning to the introduction of change, and change to improvement. The Academy and its team embrace the need for change and for continuous improvement.

The procedure taken for the monitoring of the Quality Assurance policy is to have quarterly meetings with the Trainer to go over the Quality Assurance policy. A checklist would be drawn up to ensure that all the aspects of the QA policy are being adhered to. When discrepancies are found, recommendations would be issued to the Trainer to immediately comply with all the requirements of the QA policy. The checklist and any remarks would be kept in the Academy files.

Appendices

- Appendix I - Dhalia HR Management – Strategic Policy
- Appendix II - Dhalia Employee Handbook
- Appendix III - Dhalia CSR Policy



Dhalia Real Estate Services

Human Resource Management

Strategic Policy Document

November 2020

Version 3.0

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1.0 RECRUITMENT

Recruitment activities are designed to affect:

- The number of people who apply for vacancies
- The type of people who apply for them
- The likelihood that those who apply will accept the positions offered

Screening of applicants is the primary responsibility of the HR Department in collaboration with Branch Managers. Their role is to conduct interviews, carry out any test that might be necessary as part of the screening process and recommend successful applicants to Dhalia for recruitment.

They will also be responsible to monitor the proper adjustment of new recruits over the first 2 months of working with Dhalia Real Estate Services.

1.1 Recruitment Sources

Dhalia will be responsible for the marketing aspects of attracting potential employees (Also refer to the Marketing Strategy Document).

All adverts must be approved by the Marketing & PR Department to ensure that the wording and layout truly reflect the Brand Image of the company.

- **1.1.1 Advertisements**

- Image advertising is important for the company
- The advert must describe the challenge and responsibility associated with the job
- A consistent brand image must be relayed
- Frequency of advertising will depend on corporate needs and response rate.
- Size of advert must be consistent
- There are 4 ways in which a prospective applicant responding to an advert may apply:
 - (1) Send their details by email on “vacancies” through the website
 - (2) Make a telephone call to Head Office
 - (3) Send their details by post.
 - (4) apply in person at any Branch Office (Direct applicant see 1.1.2)
- For the first three (3) above the following procedure will be followed:
 - Applicant details will be screened by the HR Department and will contact the applicant directly within a week and after conducting a brief telephone “interview” to ensure basic requirements are in place, schedule an appointment for a remote or face to face interview with the applicant.

- **1.1.2 Direct applicants / referrals**

If potential applicants come through a referral process it is possible that their first encounter with management will not be with the HR Manager. The manager will pass on the applicant’s details to the HR Manager who must be informed that applicant was a direct referral through one of the present employees.

- Direct applicants tend to be good sources from which to draw as they already believe in Dhalia.
- Managers and consultants must lead the way in sourcing new recruits through recommendations
- There could be problems with internal referrals if Dhalia is already not satisfied with the current employee making a referral, however this should not interfere with the process of vetting the applicant
- No real strategy is needed for direct applicants / referrals. Dhalia is always open to meet such people.
- All direct applicants who apply at a Branch Office will meet the Branch Manager who will in turn conduct the first interview. If the Branch manager is satisfied with the recruit he/she will contact the HR department to schedule a second interview and pass on applicant details.
- If the Manager is not available to interview the direct applicant, then the MA is to gather as much information as possible and carry out the initial screening process. The MA, if satisfied on basic criteria (owns car / is 18 years of age / overall first impression) then she is to contact HR department and pass on the information so that the HR team may contact applicant to schedule an interview. If an MA is in doubt with regards to first impressions then we advise to give the applicant the benefit of the doubt.

- **1.1.3 Main Sources of recruitment**

- Newspapers
- Billboards
- Posters
- Vacancies signs at Branch Offices
- Recruitment events “Introducing Dhalia”
- Employment Fairs
- Social media sites such as Facebook / LinkedIn / Instagram
- Internet promotions called “e-Blast”
- Recommendations
- Brand Image
- Social Responsibility events
- Special themed events such as “Green Month”
- Press Releases – general publicity
- All potential recruits will have their details received / sent to the HR Department. They will follow the same procedure as explained in section 1.1.1

2.0 SELECTION

2.1 Selection forms / tools:

- Dhalia Interview Form (*to be administered during 1st interview and continued in the second interview*)
 - In the case where a Branch Manager conducts a first interview and is satisfied with the recruit, then the form will only be completed when the new recruit attends an interview at the HR department.

2.2Entry Requirements:

The entry requirements to work as a Sales Consultant and obtain the necessary licence. Applicants are required to have any one of the following :

- A minimum of 5 'Ordinary' Level passes (or their foreign equivalent) in any subjects with English Language being one of them.
- Three years experience in a full-time Sales / Letting position in the Real Estate Industry
- Four years experience in a full-time Sales position not related to the Real Estate Industry
- Five years experience in a full-time job even if not related to Sales or the Real Estate Industry

2.3Selection Methods:

Much of the work in personnel selection involves observing and measuring characteristics of people to determine who will be most suitable to join the Dhalia Team.

2.3.1 The Telephone Interview

This will be conducted by the HR Department

A short telephone "interview" or communication through email will be conducted in a very informal way to determine the candidate's suitability to be interviewed "face to face" and to identify if they out-rightly fail critical criteria (owns a car / over 18).

If the applicant "fails" the telephone interview, he/she will be informed immediately and the application stops at this point.

The applicant's details will be kept on file (CVs "year") in the HR Department at Head Office once permission is granted by the applicant (according to GDPR regulations).

If the applicant "passes" the telephone interview a face-to-face interview will be scheduled.

All first interviews will be held, either face to face at Head Office or through an on-line platform. The exception to this will be for direct applicants at Branches who meet the Branch Manager first.

2.3.2 The first interview

This will normally be conducted by the HR Department

This interview, which will make use of the Dhalia Interview Form as a guideline, will be used to short list potential candidates based on an assessment of the following attributes:

- Personal details
 - CV
 - education & social background
 - Past work experience (sales) or other

- Personal characteristics
 - Extroversion:
 - Sociable
 - Assertive
 - Neat Appearance
 - Maturity
 - Enthusiasm
 - Communication skills
 - Motivation

 - Adjustment
 - Emotionally stable
 - Secure
 - Self-supporting
 - Are there any current financial and/or legal considerations that might have an effect on the job, e.g., house purchase, children and college expenses, car purchases?
 - Are financial considerations negative factors? Will undue pressures be brought to bear on the employee or his/her family as a result of accepting this job?

 - Agreeableness
 - Courteous
 - Good natured - Pleasant personality

 - Inquisitiveness
 - Curious
 - Broad minded

 - Language skills
 - Spoken ability (Maltese / English)

 - Motivation for the job
 - Money
 - Sense of freedom
 - Achievement
 - Spouse attitude

If an applicant looks like he / she has potential but no tools in hand, then Dhalia can offer to assist and provide them.

2.3.3 The Second Interview

If the applicant passes the first interview a second interview will be scheduled at the branch to which the HR Department feels the applicant will be most suitable. The respective branch manager together with the HR Executive (if available) will conduct the second interview at the branch.

2.3.4 Rejection of applicant after first interview

If the applicant is not considered to be suitable for Dhalia, the HR Department must justify this decision by appropriate comments on the applicant Interview Form. This form will be destroyed by HR. The HR Department must inform the applicant of this decision by telephone and email within 24 hours.

2.3.5 Rejection of applicant after second interview

If the applicant is not considered to be suitable for Dhalia, the Branch manager must justify this decision by appropriate comments on the applicants Interview Form.

If the branch manager does not agree to recruit the applicant two outcomes are possible:

- (1) The HR Department will inform the applicant by telephone and / or email that his / her application has not been successful and the process ends there. The interview form will be destroyed by HR.
- (2) The HR Department could decide to schedule a 3rd interview for the applicant at another branch with another manager. If this interview fails, the HR Department will inform the applicant by telephone and / or email that his / her application has not been successful and the process ends there. There will not be any possibility for the applicant to be interviewed further by any other manager. The interview form will be destroyed by HR.

2.3.6 New Recruits

If after the 2nd interview the branch manager finds the applicant suitable for his / her branch, then the HR Department will co-ordinate a start date with the new recruit and communicate a list of documents that the new recruit would be expected to bring with him / her on the first day of work, some of which would already be in hand due to the application process.

FOR ALL NEW RECRUITS

- Full name
- Father's name
- Mother's name & maiden surname
- Address
- Post code
- ID card / Passport + photocopy
- National Insurance number (NI)
- Telephone numbers
- Date of birth
- Marital status

- Police conduct
- CV
- Colour Photo (digital) Hi-Resolution jpeg format

THE FOLLOWING ONLY APPLY TO THOSE WHO WILL BE SELF-EMPLOYED ON A COMMISSION BASIS

- Car – model – colour – registration number
- VAT registration number

THE FOLLOWING ONLY APPLY TO THOSE WHO WILL BE SALARIED EMPLOYEES

- FS3 of previous employment
- Tax status – single –married or parent

3.0 INDUCTION PROCEDURE

On the first working day the new recruit will report to Head Office for Dhalia Orientation and signing of Agreement / Contract.

3.1 STAGE 1

Areas that the induction process at Head Office must cover:

- Complete starter form, sign contract in duplicate & all other administrative work related to documentation required by new recruit
- History and background of Dhalia Real Estate
- Shown company website
- Company policies & values & image
 - Company handbook explained
- Familiarity with all official documentation that new recruit will need to know
- Meeting with CEO and CFO

3.2 STAGE 2

The HR department will then direct the new recruit to report to the Trainer to start his/her induction training. The MA and Manager will be informed of the new recruits start date and training schedule. Trainer will liaise with Manager regarding the process and expected date of commencement at the branch office to ensure that they are there to greet him / her. It is important that once a decision to employ a consultant has been taken, the manager and MA are to co-ordinate with the IT department to ensure that a fully operational desk is available for the new recruit on his / her first working day.

It is expected that on arrival, the MA or Manager will take the responsibility to introduce the new recruit to all other team members and to carry out a basic on-site orientation.

From this stage onwards and until the new consultant / employee is fully trained, the respective manager will assume full responsibility for the development and training of this consultant / employee.

- within week 1: IT Department will supply new recruit with email address and include him/her in group notices issued from time to time
- HR Department will issue email to the entire group informing them of new recruit with photograph
- The respective manager will update the HR Department (verbally or by email) on the new consultant / employee's progress and is expected to provide an early warning signal to the Human Resource Department if for any reason the manager is unsure of the new recruit. Positive feedback will also be welcome, however the underlying assumption by the HR department would be: "No news... good news"
- The first 60 days will be considered as "training days". See appendix 1 for training plan. It is imperative that managers follow this plan so that we can establish a unified standard to be able to compare progress of all new recruits from all branches against a common benchmark.
- Based on the new consultant / employee's past experience of the industry, the above training plan could be modified. This, however can only be done after due consultation between the manager and the HR Department and agreement has been reached.

3.4 Monitoring new recruit's adjustment to Dhalia.

- The HR Department will organize a meeting with the new recruit after the three months to discuss the new recruit's adjustment to Dhalia's culture and working environment. Regular communication between HR and the manager would ensure the smooth introduction of the new recruit in the first 3 months.
- The CEO and the respective branch manager will be informed of the outcome of such meetings.
- Appropriate action (on a case-by-case basis) will be taken if the meeting produces unfavourable outcomes.

3.5 'Licence Training'

Dhalia Real Estate has applied for accreditation from NCFHE for its in-house training for the required Licence that all Consultants must have by the end of 2021. Dhalia will be planning courses for Consultants and Managers accordingly. Consultant training will cover 8 Modules with a total of 40 hours (MQF Level 4, 12 ECTS). Managers training covers 12 Modules with a total of 60 hours (MQF Level 4, 8 ECTS).

All Consultants and Managers must sit in for all the Modules and hours will be registered. All Modules will have a test at the end and should all hours be covered and all tests successful, the

consultant / manager will then obtain the applicable Award certificate with which he/she would be able to apply for the relevant licence.

Consultants Module training cover the following areas:

- Module 1: The Role of the Property Consultant
- Module 2: The Real Estate Industry (Property Market)
- Module 3: Understand Property Valuations & Characteristics
- Module 4: Clients Behaviour & Expectations
- Module 5: Sales Skills
- Module 6: Advertising
- Module 7: Legal Aspects of Real Estate
- Module 8: Linking Self Employment & Organizational Behaviour

Managers Module training to cover also the following areas :

- Module 9: Leadership Skills
- Module 10: Appreciation of Financial Statements & The Theory of Supply & Demand
- Module 11: Marketing Management
- Module 12: Managing People

The above course will be accredited MQF Level 4.

4.0 Competence Appraisal

The evaluation form contains statements that must be answered by the HR Department together with the consultant / employee manager on various aspects of the consultant / employee's competencies and will be completed for all consultant /employees annually.

Employees will be evaluated on a bi-annual basis. The first appraisal will take a more informal role and will serve as a guideline of what changes / improvements are expected out of the consultant / employee till the end of the year.

The analysis of competencies is made by comparing the consultant / employee under review to those of top performing people. High scores indicate that the consultant / employee's competencies closely match those of top performers. Low scores indicate deviations from the pattern of top performers' competencies and, thus, reveal areas of weakness.

For the purpose of this appraisal, "top performers" are defined as those consultant / employees who are considered to be all round "top performers" in their department.

The appraisal should be completed from the following perspective:

- What can the consultant / employee do to become better?
- No matter how successful he/she is there is usually room for improvement within any individual.

The appraisal is laid out in terms of critical competencies that are required to perform a job successfully. For each competence, the consultant / employee is evaluated in terms of his/her current level of

development. A high score indicates strength in that particular competency. A low score indicates that a competency may require further development.

'Enhanced Competencies' means that the score is in the top 20 per cent.

'Effective Functioning' means that the score is about average.

'Needs Improvement' means that the score is in the bottom 20 per cent.

For a Competence Appraisal system to have any value it will totally depend on the managers' responding truthfully to the set statements.

Any fears of exposing weaknesses about consultant / employees will ultimately have a long term negative impact on the organization and on the consultant / employee's self-development.

5.0 CORPORATE CULTURE SURVEY (every 2 years)

A Corporate Culture Survey is an essential component of organizational training and development.

A consultant / employee Corporate Culture survey will provide a picture of the organization's needs. This survey will be used to solicit consultant / employee opinions on a variety of issues such as the company's success in communicating its mission to them, or local issues such as quality of the working environment.

The survey contains a series of multiple choice items grouped along one or more dimensions of the organization.

The items included in the survey concern the following areas:

1. Management and Listening
2. Communications
3. Job Competence
4. Customer Focus
5. Information
6. Innovation
7. Interpersonal Relationships
8. Leadership
9. Working Conditions
10. Obtaining Results
11. Satisfaction
12. Personal Development
13. Strategic Leadership
14. Teamwork
15. Adaptability

The result of this feedback process provides an understanding of how the employees perceive the organization along the above dimensions. This process helps Dhalia senior management together with Branch Managers understand how the consultant / employees perceive them.

This feedback:

- is essential to facilitating development and organizational change
- allows the organization to focus on needs and leverage its strengths
- informs the organization on which actions will create problems for the consultant /employees

- provides management with consultant /employee feedback (both positive and negative) on the internal health of the organization down to the branch level
- measures the impact of current programs, policies and procedures
- can be used to motivate consultant / employees and improve job satisfaction

The Corporate survey will be administered to all consultant / employees but not to people holding a managerial role as its aim is ultimately to assess management.

The Survey will ask respondents to state the branch that they belong to but will not need to identify themselves in person. The reason to identify the branch is to enable management to identify where exactly a problem might lie and avoid a lot of wasted effort afterwards trying to find the source of the problem.

The results will be statistically compiled and presented to management.

A Corporate Culture Survey will only be valuable if:

1. It is completed truthfully
2. Management is committed to act on the results.

6.0 TRAINING NEEDS ANALYSIS

The bi-annual performance appraisals and the Corporate Culture Survey (every 2 years) will serve as the main inputs for training needs analysis.

1. Conducting needs assessment

- Organizational analysis – What needs to be learnt at an organizational level?
- Person analysis – Who needs training?
- Task analysis – What needs to be learnt?

2. Ensuring consultant / employees' readiness for training

- Attitudes and motivation – Ensure that the trainee wants to learn.
- “Sell” the training to the trainee
- Inform the trainee of the benefits to be derived from this training
- Does the training need derive from a basic skill deficiency?
- Is the training being directed towards the acquisition of new skills?
- Does the trainee require skill reinforcement?

7.0EXIT INTERVIEWS

Any consultant who decides to stop operating as a Sales / Letting consultant would need to give a valid reason for terminating by informing his / her manager of the day they will be stopping. The manager will inform the HR Department who will organize an Exit interview with the Consultant Leaving the company.

This interview may also include the Manager. Exit interviews are held to determine the reason for termination and if any issues may be solved to retain the Consultant. These interviews are also conducted on anyone still attending the Licence course and the consultant is asked about his training with Dhalia and whether he / she felt that one reason for his resignation was lack of support / training. Following the decision to leave, the necessary Termination Form will circulate Head Office so that the IT, Accounts and Marketing departments are advised to close his / her accounts. The terminated Consultant will still be required to follow up and inform the manager of any pending contracts that still need to be materialized

APPENDIX 1

New Consultant Training Program

Applicable for persons who never worked in real estate.

When the consultant comes to the branch after having concluded his/her induction training with the trainer (or during his induction training) the following tasks will be undertaken:

- The new consultant will be introduced to the MA. She will explain the general office procedures such as working hours, keys, printing, desk, personal computer, diary, email, stationery etc.
- During the first 3 days of working within the branch, an office meeting will be held to introduce the new consultant to the other consultants. The manager will encourage them to invite the new consultant to accompany them during their viewings and inspections/valuations.
- If possible, a mentor should be assigned to the new recruit. The new consultant will accompany the mentor on all tasks during the first 2 weeks, including; Viewings, inspections, valuations, promise of sales etc.
- The new recruit will already have a copy of the “Rules of the Games” (given to him/her on signing of agreement). Also, this document, as well as the employee handbook is available on the company intranet. The manager must ensure that the new consultant has read and understood the manual.
- The new recruit must be taught how to promote him/herself. Everyone needs to know that he / she is now working for Dhalia real estate. The new consultant must inform all: Family, friends and acquaintances through social networks, sms's, telephone calls, email etc. where he / she is working.
- During the **first 4 weeks** he/she should not be assigned any clients (buyers) or inspections. The only tasks that the new consultant should do alone are to visit available properties that are accessible with keys. In this way he/she will inspect the property and familiarize him/herself with the different types of properties available on the market.

The first 4 weeks of training

Using **Remind** - To understand the system

To understand the values and types of properties available

Adverts - Analyze adverts on newspaper property pages and competitors' websites

In the first 2 weeks the manager should emphasize training on **Prospecting**.

Prospecting for inspections and updating properties on Remind:

Calling owners of properties already on Dhalia database -

- Remind is full of properties on ADM (With no inspector) due to a lack of updating by their original inspector.
- After 2 to 3 training calls by the manager, new Consultants are to be encouraged to call owners of such properties in their branch area to update the property, confirm availability and try to get a price reduction. This approach is a very good exercise for new consultants to start getting in touch directly with clients.
 - It is also important for Dhalia to have as many updated properties as possible. The **benefit** for the new consultant is that if the updated property is still available and/or if a price reduction is acquired then that inspection would be assigned to him/her, thus starting to accumulate his/her own inspections. It will also serve as best practice to get new consultants used to updating regularly.

Prospecting for new inspections:

Another important task ideal for beginners but very important throughout one's career is to acquire new inspections - Sourcing from:

- Direct Adverts by owners on newspapers
- Fixed owner boards on the property itself
- Owners' magazine
- Other Direct adverts on line

The manager is expected to illustrate a number of tips of how to communicate with owners to convince them to register the property with Dhalia before this exercise is carried out by the new consultant. The manager should make a few calls with the consultant as part of the training but quickly empowers the new consultant to contact and meet as much owners as possible.

Prospecting for new inspections must be engrained as a regular task in a consultant's role in real estate.

After the 4th or 6th week

Inspections

The above exercise should bring about field work for the new consultant. Prospecting creates the need to actually inspect the property if the owner is convinced to register it with Dhalia. The manager or mentor is expected to accompany the consultant on his first few inspections. The number of inspections that need to be carried out with the manager / mentor will depend on the personality of the new consultant and it is at the manager's discretion to decide when the new consultant could go out alone. It is expected that this should be possible within 10 inspections. Where valuations are involved a manager needs to be present for a longer period of time since it takes a while for a new consultant to start evaluating the property at the right market value on his/her own.

Important Tips for Inspections

- ✓ First impression – Manners, courtesy, self-presentation skills, dress code, Punctuality etc.
- ✓ Dhalia Branding - . Company forms, business card, etc...
- ✓ Good Photos and room measurements (plans to be acquired where available)
- ✓ Client Information - fill necessary forms
- ✓ Information - Give the right information related to selling. ex. tax issues
- ✓ Value - Whatever the asking price, consultant should express an honest opinion about such a price. If the asking price is too high the message should be delivered in the most **diplomatic** way possible. If asked to propose a price the consultant has to be sure about the price being suggested.
- ✓ After the field work the inspection should be written in good English and as informative as possible with all details including email addresses.

The manager and the MA should assist the new consultant in the initial stages to ensure best practice at the early stages.

Up to this point, during the first weeks, these tasks will help new consultants to get used to the job. In combination to all the above they should also accompany managers and/or other consultants to learn different approaches adopted by different consultants.

It is important for a manager to authorize accompanied visits in order to deliver the right message.

Up to this point also, no communication with prospective buyers is to be made.

Board Fixing

Another important task which will start to create buyers' leads is that of fixing Dhalia 'For Sale' signs on properties on the market. By this time, (around the initial 5 to 6 weeks) the signs with the consultant's number should be made available by Head Office. Business Cards should also be made available.

Prior to fixing a sign, a consultant should get the owners' permission and inform the MA where boards have been fixed.

Adverts

At this stage; where a new consultant has been making contact with sellers and started to inspect properties he/she must be given the opportunity to place adverts. Classified or box adverts in Sunday newspapers are generally used but other adverts are not excluded. The consultant can start with properties inspected by him/her so that he/she will have a good knowledge of the advertised property and would already have a good relation with the owner. The MA should assist in the formulation of the first adverts and also inform the consultant about periodical budgets. It is important to start with 1 or 2 good adverts.

Viewings

Hopefully adverts and board fixing will bring about enquiries to view properties.

Here the consultant has to get used to securing appointments with owners and/or calculate the duration of appointments, including driving and parking time if different properties are to be shown to prospective buyers.

The manager should assist with the first viewings and appointments.

If the consultant has been on accompanied visits before, this will serve as a great benefit and will help him/her do a better job when alone. Punctuality, self-presentation and knowledge of the properties being shown are critical. A consultant is urged to view the property before any viewings with prospective buyers.

Equally important is the follow-up work after a viewing.

- Ensure to get feedback from prospective buyers – make notes – this helps create a profile of likes / dislikes / needs / want of prospective buyers
- Follow up/ proactively call and supply feedback to owners who will be anxious to know what the prospective buyers thought of their property
- Register Viewing actions on Remind

Generating Leads

At this stage a new consultant will start getting leads. Main sources for leads are: adverts, boards, internet enquiries (assigned to him/her by the manager) if the manager feels he/she can handle them, referrals can also become a good source

So it is of vital importance that leads are registered. Managers are to urge consultants to use the system which they feel is the most convenient and efficient for them to use. However, Dhalia has the Customer Relation Management (CRM) system which can be used. This is accessible by the manager and the MA.

Dhalia asks for a monthly list of leads generated indicating the source.

On a regular basis, consultants should dedicate time for lead generation. Through calling past clients, updating of Remind, current potential buyers, contractors etc. and register any leads acquired.

Getting the first sale

At this point a new consultant will start to better understand that it is not so easy to get an offer. They therefore need basic skills to better understand customers' needs and offer them the right properties. They should also be aware that many viewings are needed to hit the right property. Viewing properties with potential buyers is always a healthy exercise since the new consultant will be enhancing his / her knowledge about what is available and will also be building a good rapport with owners (Hence ensure that they give feedback to owners)

Closing

Ideally managers should be present with new consultants on second viewings when these occur. It will be difficult for a new consultant to close a deal the first time round. This is a new experience and assistance by the manager is essential. It is important however that the manager involves the consultant as training for future deals.

It will be at the managers' discretion when to allow a new consultant to attend second viewing on his/her own and when to allow him/her to close a deal alone.

Attending a Promise of Sale

It is ideal if during the first weeks of employment of a new consultant the office has a promise of sale (or actual sale) so that he / she can attend and observe the procedure. However, whenever the new consultant has his/ her first promise of sale it is a must for the manager to attend. It all depends on the closing stage where the manager also has to be actively present to secure the deal. The

consultant should be shown in practice how to fill in the necessary forms; mainly the commission sheet and get it signed at the end of the promise of sale.

Follow-Up work after a promise of sale

All deals need different follow-ups. So it is very important that a consultant is made aware of this work after a promise of sale. This is a job that he/ she could easily be assigned to perform since it does not involve negotiations and will not have any negative effect since the deal would be secured.

Attending a contract

It is also important for the manager to assist in the first contract (final deed). Here Dhalia will get paid for services rendered and the consultant must ensure that the deal is concluded on the best of terms possible with both sellers and buyers. This is an investment in future referrals and possibly repeat clients.

Conclusion

Where possible the above guidelines should be followed as it gives Dhalia a corporate approach to induction of new consultants. It is however understood that it is difficult to find the right formula to train a new consultant. Managers are allowed discretion to deviate from the above guidelines, however justification would be necessary and ultimately efficiency and effectiveness of the new consultant are the ultimate goals.

The time frames mentioned could differ according to the personality, learning ability, experience and age of a consultant. Many of the technical issues emerge during the various tasks attended to by the new consultants. Important skills such as negotiating and selling skills can differ but these will improve by time and by practice.

It is ultimately the managers' responsibility to ensure that he/she is leading a well-trained and capable team of consultants who generate results.



Dhalia Real Estate Services

EMPLOYEE HANDBOOK

Version 7 – SEPTEMBER 2020

Employee Handbook:

Last Revised: September 2020:

Effective Date: 10th September 2020

**For questions or comments regarding this Handbook or
for requests to update this Handbook contact the
Human Resource Department**

**This Handbook is the property of Dhalia Real Estate and should be
returned to Head Office in its entirety when an employee / property
consultant or manager leaves Dhalia.**

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How to use this Handbook

This Handbook is a brief guide to the conduct expected of you while you are working at Dhalia Real Estate Services. It is a summary of some of the basic Company Policies and legal requirements that affect our business. For details regarding the matters covered in this *Handbook*, please consult the Human Resource Department at Head Office. The guidance in this *Handbook* applies broadly to full time employees, part-time employees, consultants, managers, as well as to independent contractors while they are performing services for the Company.

A few sections will obviously apply only to Company employees and consultants.

This *Handbook* summarizes the major Corporate Policies of the Company that apply generally to Dhalia's operations. You should be sure to read this *Handbook*. If local law or labor contracts conflict with a Company Policy, then the local law and labor contracts take priority over the Company Policy.

Otherwise, practices in all branches must conform to the Company's stated Policies. If you are unsure of the policy to follow, please consult your manager, the Human Resource Department or the Chief Executive Officer.

Again, please remember that this *Handbook* is only a quick reference tool.

Responsibility

Dhalia is committed to conducting business fairly and honestly. This commitment to integrity requires each of us to act ethically.

Each of us is expected to act, at all times and in all circumstances, with the highest sense of integrity on behalf of the Company. We are expected to act in a manner that protects and enhances the Company's corporate reputation.

All personnel must know and comply with the spirit and the letter of all Company Policies and legal requirements related to their work. If you lead and manage any personnel, you are expected to take reasonable steps to ensure that they, too, know and follow Company policies and any applicable legal requirements.

Remember, anyone who violates the law or a Company Policy may be subject to disciplinary action, up to and including termination or release. Violations of the law can expose the Company, and even the individual violator, to fines, penalties, civil damages, and, in some cases, imprisonment.

Additionally, violations could damage the Company's reputation and result in lost sales and profits.

Duty to Report Violations

All personnel must report all known or suspected violations of Company Policy or business-related legal requirements, including:

- Civil and criminal laws, and government rules and regulations
- This Employee *Handbook*

If you become aware of a known or suspected violation of Company Policy or business-related legal requirements, you should report it promptly to your Manager, The HR Department or the Chief Executive Officer

All reports are handled as confidentially as possible, while still enabling the Company to conduct a thorough investigation.

Company Policy prohibits any form of retaliation against individuals who, in good faith, report suspected violations of the law or Company Policy, or who cooperate in an investigation of a suspected violation reported by someone else.

1.0 INTRODUCTION

Congratulations and welcome to Dhalia Real Estate Services. You have been asked to join our team because of your abilities, and/or experience, quality of your past performance but most of all your future potential. We hope your skills and personality will contribute to our mission — to deliver a reliable and responsive, professional service.

We have developed this handbook to provide you with an information resource for your concerns and answers to questions that frequently arise regarding our basic engagement policies. It will also be your first task, as a new member of the team, to thoroughly read this handbook, and direct any questions you might have about the policies outlined here to your branch manager or directly to the Human Resource Department. Keep this handbook for reference. The policies outlined cover all categories of staff and consultants within Dhalia

The policies stated in this handbook are subject to change at any time at the sole discretion of Management. From time to time, you may receive updated information regarding any changes in policy.

The contents of this handbook are not intended to create a contract or agreement between Dhalia and you.

2.0 ABOUT THE COMPANY

Dhalia Real Estate Services was founded in 1982 in Malta. Presently, the company has expanded to become the largest privately owned real estate agency on the islands of Malta and Gozo. It was established to provide the highest level of real estate consultancy in Malta. Our branch network incorporates offices across the Maltese Islands; each branch is strategically located for ease of access to clients, and offers expert local knowledge and specialist business understanding.

The organisation currently has a branch network which incorporates 15 Sales & letting offices in Attard, St.Paul's Bay, Gozo (two offices), St.Julians, Balluta, Sliema, Tigne, Ibrag, Gzira, St.Venera, Valletta, Bormla, Fgura and Marsaskala.

The branch network is supported by a comprehensive head office team. The Dhalia head office offers corporate services including finance and accounting, general administration and legal services, information technology, human resource management and marketing. Our dedicated and hardworking team is composed of over 150 sales associates, branch managers and staff. These individuals come together as a team, completely focused on meeting your specific requirements through the Dhalia Promise. This means that we are totally committed to providing a thoroughly transparent, high quality service.

Thanks to this team of highly trained professional property consultants, Dhalia's portfolio of services goes beyond intermediary services. This includes advice on property investment and development of new projects, property management and valuation of all types of property. Dhalia's team comprises of highly skilled and well-trained agents who provide their customers with a unique blend of knowledge, experience and the modern skills required to meet the demands of a rapidly changing property market. Their dedication, passion and hard work transpires total commitment to their customers, providing vendors and end-buyers with a thorough, high quality service that adheres to their wishes and has all the checks and safeguards in place to provide total peace of mind for any sale, purchase or letting.

With the installation of the latest in-house technology, Dhalia offers real-time information to all the branches to be at the service of their customers. Easy and timely access to information enables each Dhalia consultant to provide efficient and accurate servicing of customer enquiries. Dhalia's website & Facebook page provide extensive information and advice, together with a full online database that is updated in real time and can be directly accessed by customers.

At Dhalia, we know what it takes to be successful in this fast evolving industry – Regular investment in the education and training of our property consultants ensures they are kept abreast with the latest skills, news and market trends. Dhalia's property consultants are in a position to provide professional guidance to customers in all market niches and across all price ranges.

Dhalia prides itself in extending the highest level of professional service characterised by personalised & individual attention to the customer. We do not just offer real estate services; we go beyond this to provide a full real estate consultancy service. Therefore our promise to prospective clients is significant and is the result of extensive market research, in-depth knowledge and considerable experience in Malta's property market.

2.1 History of Dhalia

1982

Christopher and Mark Grech established Dhalia Investments Limited, a small estate agency, employing two staff.

1986

Dhalia Group pursued a wide range of development activities including farmhouse conversions, commercial premises and larger multi-unit turnkey projects.

1987

Dhalia Group opened 6 regional offices (in Gozo, Marsaskala, St Julian's, Balzan, and Northern Malta) employing a total of 40 specialist support staff

1990

In what must have been one of their major ambitions from the beginning, Chris and Mark acquired the estate agency business of Grech Alexander from their father in 1990.

1991

Dhalia launched the Property Pages, a property magazine showcasing the very best of the company's portfolio in terms of residential, commercial and letting properties.

1995

A negotiator's handbook was introduced to guide Dhalia's agents in how to conduct business and inform them of the values of the company.

1997

Dhalia's logo changed from dark blue to black and gold.

Dhalia made its first appearance on the World Wide Web in 1997, located at www.digigate.com/dhalia. The web page contained information on the company and its services, as well as how to buy property in Malta. Malta's first online property database was created with a few hundred property listings displaying penthouses, bungalows, farmhouses and maisonettes.

1998

www.dhalia.com was officially launched allowing early web users to access real estate services online.

2000

Dhalia launched its biggest project to date: the Bay Street Complex in St

George's Bay, St. Julian's. As the first development of its kind in Malta, the complex was set up as a venue for family entertainment and centre for culture and the arts

2002

Dhalia celebrated its 20th Anniversary

2003

Dhalia website revamped to include a database of 15,000 properties and a fully integrated search engine, as well as links to local banks and Dhalia's overseas partners. Dhalia extended its overseas network through strategic partners in the UK and Ireland, as well as Central Europe.

2004

Dhalia started its luxury property brand Luxury Living, with the tag line "Good enough is not enough". Luxury Living was based in Portomaso and provided independent advice to buyers and sellers of upmarket property within the Maltese Islands.

2005

Dhalia Real Estate was given a five-star award and voted Best Real Estate Agency in Malta at the 2005 edition of the Bentley International Property Awards. In the International property world these annual awards are equivalent to film Oscars.

2008

Dhalia's magazine, the Property Pages, was renamed Places - a quarterly magazine distributed with the Sunday Times of Malta.

2009

2009 saw the completion of the Balkan Jewel after 2 years of work. The project consisted of 160 spacious apartments finished and furnished to high standards and complemented by all other amenities expected of a holiday complex. Features include a restaurant, mini-market, lobby bar, fitness centre and spa, outdoor heated swimming pool and conference facilities.

2011

Dhalia launched the first iPhone property app to help its customers quickly find property within their immediate location, through a geo-located search. The app provided customers with a new interface to access the company's extensive database of properties in a simple, interactive way.

2012

Dhalia's TV series for home buyers, D House, was produced by Dhalia Real Estate Services, and presented by TV personality Clare Agius, D House aired on One TV and followed couples and individuals as they searched for a new home.

2015

In 2015, Dhalia became a major sponsor of V18, promoting Valletta as the European Capital of Culture in 2018

2016

In April of 2015, Dhalia LED began as a part of the company's commitment to sustainability, and to bring energy efficient lighting to the Maltese market.

3D technology became a part of Dhalia's marketing tools in May 2015, providing an immersive digital model of home interiors, together with detailed measurements of the property as well as an automatically generated floor-plan, for a complete understanding of the property's layout.

2017

The history of Dhalia is completed up to this very moment, as we look back on what has brought us here together at this very moment. Dhalia celebrated its 35th birthday in the best company it could wish for. Congratulations for making Dhalia successful, and here's to another 35 years!

2.2 The Dhalia mission:

At Dhalia Real Estate Services we believe that our role is to help people find what they are looking for, acting as guide and educator to ensure our customers feel as comfortable with their new property as they do with us.

Since 1982, Dhalia has followed this philosophy by building a reputation that has been based on trust and professionalism and allowing the company to grow to become Malta's largest privately owned real estate agency.

- Our qualified team will ensure that the customer buying or selling process is thorough and complete with first class service.
- Our team can provide customers with a market valuation of their property.
- Our team will provide a real estate consultancy service to the business community through our dedicated and specialised department.
- We will provide customers with sound property-related advice and when requested we will assist them further by liaising with notaries, lawyers, architects, planning officers and banks.
- Our team is fully qualified and knowledgeable in the property industry.

Dhalia has set out its goals to allow its clients to clearly see what drives the company and to understand why it does business the way it does.

Our key goals are:

1. To satisfy the basic need of individuals, couples or families for shelter, security and safety through the identification of housing opportunities which are commensurate with their personal income, lifestyle and socio-economic standing.
2. To satisfy the business needs of small, medium and large enterprises for operating space through the identification of suitable commercial premises.
3. To satisfy the business needs of private and institutional investors for the construction of accommodation through the identification of feasible projects for development.

2.3 Dhalia's Promises to stakeholders

- *Our brand is built on trust.*
- *We promise never to break your trust*

We promise to:

- Continually provide the highest level of real estate services in a transparent and professional manner.
- Treat all of our stakeholders with respect and integrity in every transaction and to behave ethically and with sensitivity to the needs of the vendor and buyer at all times
- Respect customer confidentiality and privacy
- Provide impartial advice to ensure peace of mind for any sale, purchase or letting business conducted by any of the company's representatives.
- Never break customers trust as the brand is built on a trusting foundation.
- To foster a lifelong relationship with all stakeholders, and continue to provide top-level service when required.

2.4 Mission Statement:

Our mission is to provide a unique, personalised and professional service to home owners and prospective home buyers at all times.

Real Estate Real People

2.5 The Company Values:

Dhalia values adhere to the highest standards of integrity and quality. We value individual uniqueness; a spirit of trust, caring, open communication, and team work; loyal, creative, and diverse employees; a dedicated community of stakeholders and the continuous improvement of a world-class staff and consultants committed to the highest standards of personal and professional development, productivity and social responsibility.

- We believe that the services we provide are important to our customers.
 - We value honesty, integrity, and the highest standards of ethics as we work with our team and diverse members of our community.
 - We value accountability and personal responsibility.
 - We value life-long learning.
 - We value individuality and creativity.
-
- We value open communication and mutual respect.
 - We believe in balance between work and family obligations.
 - We believe in the importance of personal and professional growth.

3.0 THE TEAMWORK APPROACH

3.1 Standards of Service

Dhalia has set a high standard of behavior which it has a right to expect from its employees and consultants. We urge you to assume full responsibility for our reputation in the community. Be uncompromising in your honesty and integrity, and always make sure your personal conduct is the very best it can be. A moment of carelessness or discourtesy may break down the goodwill we have been building for years.

Remember:

- Customers judge Dhalia by its consultants and employees' conduct, image, professionalism, hospitality, enthusiasm and pride.

4.0 WHAT IS EXPECTED OUT OF YOU

- Obey all laws, follow all policies and procedures, and keep informed of policy and procedural changes. This will ensure prompt and accurate service to our customers. You should strive to provide quality service and feel good about a job well done.
- Be courteous and helpful. Make certain everyone you encounter, over the telephone and in person, receives consideration and superior service.
- Be a good listener. Whether you are dealing with a customer or another employee or consultant, listen to their point of view. Remember, your colleagues are your internal customers and need your inputs and outputs too for the team to function effectively. Understand occasional frustration or anger without judgment.
- Ask questions. Ask your manager any questions you may have about your job and company guidelines. Ask questions to your customers that will help you help them.

5.0 PROFESSIONALISM

5.1 Code of Professionalism

Professionalism is an intangible concept. It is a balanced combination of education, honesty, talent and common sense.

As a Dhalia employee or consultant, you are a caring, open-minded individual. You are well educated in your field and have the ability to utilize all of your knowledge to the benefit of your team and customers.

As a team player, you are able to put your own ego aside in order to better contribute to the Dhalia Team. Take pride in your work and take full responsibility for your actions.

As a Dhalia professional, you have developed your listening talents and are able to communicate with your customers and team-mates without intimidating them. Remember that all new consultants need time and experience to develop such skills.

Pulling it all together; Working with Dhalia is a challenging yet rewarding task and through cooperation, teamwork, and a few guidelines, you can be successful.

5.2 Guidelines to Professionalism

1. Listening to your customer - the most difficult skill to learn, but the most valuable once mastered.
2. Service to the best of your ability all of your customer's needs. Never deny him/her the proper amount of service time and always try to anticipate customer needs
3. Teamwork and cooperation will make everyone's day go better. Help your team-mates whenever possible, irrespective of which branch they belong to. Each individual member of the team serves an integral part in the success of the organisation.
4. Avoid gossip about customers and/or co-workers.
5. Support the expertise of your team-mates. Never put anyone down in front of others especially in front of customers.

6.0 STANDARDS OF PERFORMANCE AND CONDUCT

Consultants and employees are expected to meet acceptable standards of conduct and performance.

Satisfaction of these standards not only promotes productivity and efficiency, but also helps to ensure a pleasant, safe, cooperative and productive work environment.

The following are examples of unacceptable conduct or performance; they represent some of the types of actions for which you may be disciplined, up to and including discharge for cause. These examples, however, do not cover all the types of performance or conduct that are considered unacceptable. Common sense should serve as your ultimate guideline.

- A violation of computer and/or network security
- A violation of safety or security practices
- Absence from work without giving due notification to one's manager, or a pattern of unacceptable attendance, tardiness or patterned absences on a reoccurring basis over a period of time
- Unlawful discrimination and/or harassment
- Violation of any Dhalia policy or procedure
- Engaging in unprofessional or discourteous conduct toward others
- Overall poor work performance; missing appointments, deadlines and inaccurate work leading to disappointed customers
- Wasting or abusing Dhalia property or the property of a fellow worker or customer.

Certain types of conduct are considered so serious that, depending on the circumstances, they may result in immediate discharge for cause. Examples of such conduct include, but are not limited to, the following:

- Insubordination
- Willful neglect
- Dishonesty
- Falsification of records
- Deliberate damage to customer, teammate or Dhalia property
- Theft
- Fighting
- Substance abuse
- Threatening or committing physical violence against another person
- Bringing or being in possession of a weapon
- Harassment (Sexual, Discriminatory, Personal, Psychological, Verbal)

7.0 COMMUNICATION

7.1 Communication within Dhalia

Through effective communication and a common goal we will come together to form a strong team and work as one unit to the benefit of all.

Communication decreases misunderstandings between team members and increases cooperation on a day-to-day basis within the company.

Any grievances or issues brought forward by you to the HR department will be treated in strict confidence.

Communication aids in educational growth through information exchanged during staff meetings, as well as one-to-one discussions between consultants / employees about daily work with customers.

7.2 Communication with Customers

Effective communication with a client will greatly reduce stress for you. When you acquire a thorough comprehension of client's needs, mistakes and misunderstandings are eliminated. You can proceed with servicing the client, knowing that you and the client have a mutual understanding of the desired results.

Good communication creates a bonding relationship with a client and is one of the most effective tools to building a clientele. It promotes a trusted and relaxed atmosphere for a sceptical or unsure client. A client who is pleased with the service rendered and who feels comfortable and secure with the staff will promote Dhalia through word-of-mouth much more readily than a client who is serviced well, but in a brash and hurried manner.

Communication skills are easily learned but sometimes difficult to put into practice. They will be constantly stressed throughout our training programs - sometimes more so than the service skills themselves, because without communication skills, even the most talented service provider will be ineffective and not survive in this industry.

Great communication will be reflected in building yourself to acquire the necessary confidence boost as well as a positive attitude in all your work.

8.0 GETTING STARTED ON THE JOB

8.1 Orientation and Probation period

An orientation period provides the consultant / employee and Dhalia a time frame within which to determine if Dhalia is the right environment for the consultant / employee and if the consultant / employee is qualified for and suited to the work to be performed. All consultants / employees are considered “in training” during the first 60 days of employment. The orientation period may be extended at the discretion of and as required by management. After one month of engagement a follow-up meeting with the Human Resource Department will be held to examine the consultants / employees’ progress.

By law the probation period is 6 (six) months for employees on indefinite duration contracts.

8.2 Office Hours

Employed Full Time Staff at Head Office

- 0900hrs – 1800hrs: Monday – Friday
- Full-Time Reduced or Part time employees will work the hours according to their agreed work contract.

Employed Full Time Staff at Branch Offices (Manager Assistants (MA’s))

- 0900hrs – 1730hrs: Monday – Friday
- 0900hrs – 1230hrs: Saturday
- Full-Time Reduced or Part time employees will work the hours according to their agreed work contract.

Self-Employed personnel (Branch Managers & Consultants)

- 0900hrs – 1900hrs: Monday – Friday
- 0900hrs – 1300hrs: Saturday

Consultants will only be allowed to report late to the office if they have an appointment recorded on the Main Diary from the previous day or if they would have the manager’s approval. Consultants are to call their manager before 0900 if they unexpectedly need to report late for work.

This courtesy call reflects good manners and respect which should never be taken for granted.

8.3 Lunch Break

Employees who work an eight-hour schedule normally receive 1 (one) unpaid hour for lunch. Part time employees working five hours or less do not require a lunch break. Ultimately for anyone not employed on a full-time basis the break entitlement or duration depends on the specific work contract one has with the Company.

9.0 TIMEKEEPING ETHICS POLICY

Dhalia as an employer is subject to numerous laws and regulations that govern the way it conducts business. The laws that regulate employees' wages and hours are designed to ensure that employees are paid, as specified, within these regulations. These records contain valuable information pertaining to scheduled hours worked, vacation accruals, sick accruals and leave reporting.

It is the responsibility of each employee to report his/her time worked, and/or leaves accurately and completely for each pay period. Any falsification or misrepresentation of time and attendance information may result in disciplinary action, up to and including termination.

Payroll employees and Managers are responsible for ensuring that the work and leave time reported accurately reflects each employee's activity for each pay period.

Each employee assists Dhalia in being compliant with all National laws and regulations when they adhere to the company's practices and policies and your cooperation is greatly appreciated. It is the expectation that every Dhalia employee will adhere to all timekeeping practices and Personnel Memorandum polices that address payment of employee hours and wages.

9.1 Attendance Policy

9.1.1 Attendance and tardiness

Regular attendance is essential to Dhalia's efficient operation and is a necessary condition of engagement. When consultants / employees are absent, schedules and customer commitments fall behind, and other consultants / employees must assume added workloads.

We anticipate you'll practice self-imposed responsibility, rather than having it imposed by others. Consultants / Employees are expected to report to work as scheduled and on time. Regardless of the reason, if you aren't with your fellow consultants / employees as scheduled, you are loading others with your responsibility.

If it becomes necessary for you to be absent or late, it is your responsibility to notify your manager at once to explain your situation and when you expect to return / show up for work. This of course could take place for a purely justified reason, especially where consultants are concerned due to client appointments. Failure to do so is cause for disciplinary action. Do not ask a friend or relative to do your calling, except under conditions which make your personal phone call impossible. If your manager is unavailable, a message should be left or an email should be sent. In the case of employees, Head

Office should also be informed. If the absence is to continue beyond the first day, the employee must notify the Manager on a daily basis unless otherwise arranged. Calling in is the responsibility of every employee who is absent. Management has the discretion to require you to substantiate any absence or late arrival.

If employees are absent for three consecutive work days without notifying their Manager this action may be considered as a voluntary termination.

9.2 Weather conditions

During times of inclement weather, the consultant / employee shall make his/her best effort to arrive at Dhalia in time for the regular work day. The following clause does not apply to self-employed personnel: Dhalia will allow a maximum of one-half hour for late arrival for the employee to be paid for a full work day. Late arrivals in excess of one-half hour will result in the employee being paid for actual hours worked. It is management's discretion to determine what classifies as "inclement weather".

9.3 Overtime (Not applicable for self-employed consultants)

Full time employees are eligible to receive overtime pay if they are expected to work more than 40 hours in a given week. Holiday, vacation, and sick time are not included in hours used to determine overtime eligibility. Overtime pay equals 1.5 times an employee's regular hourly rate. All overtime must be approved by the employee's direct manager in advance.

10.0 OFFICES

All employees are entitled to use the office facilities however you are expected to treat Dhalia property with due care and attention to minimize damage, breakages and maintenance.

10.1 Telephone calls & messages

The telephone should be answered within 3 rings.

Dhalia standard for greeting telephone callers is:

"Good morning (or afternoon or evening) Dhalia"

You are encouraged to keep outgoing mobile phone calls as short as possible.

The company allows consultants / employees to make personal calls from their work station however

this should not be abused both in terms of the number of calls made and the duration of each call. Employees will be reprimanded if abuse is noticed.

Overseas phone calls are only to be made with the consent of the Manager.

All telephone messages are to be delivered to other team members **via email and are to be replied to within 24 hours**. The message should include:

- **Name of caller**
- **Telephone number(s)**
- **Time**
- **Date**
- **Actual message**

10.2 Internet & Email

Email and internet are to be used solely for business purposes. Internet browsing on sites that are not work related is prohibited. Disciplinary action will be taken should unsuitable sites be accessed. Political, religious, pornography and offensive language emails are not acceptable and have no place in Dhalia's internal communications. The same applies to chain emails of any sort. The company reserves the right to monitor all incoming and outgoing emails.

11.0 CONFLICT OF INTEREST AND OUTSIDE EMPLOYMENT

Consultants / Employees must not use their Dhalia positions for private gain for themselves or for persons with whom they have personal, business, or financial ties. As representatives of Dhalia, consultants / employees must avoid any actions that could reasonably be expected to adversely affect, or to give the appearance of adversely affecting, the independence and objectivity of their judgment, interfere with the timely and effective performance of their duties and responsibilities, or discredit Dhalia.

Consistent with Dhalia's conflict of interest policy, employees are permitted to engage in outside employment, or business activities provided that no actual or potential conflict of interest or appearance of such conflict exists and that the activity does not adversely affect their ability to perform their jobs within Dhalia. For further information regarding approval of and restrictions on outside employment, discuss this issue with the Human Resource Manager and if need be the Chief Executive Officer. All outside employment **MUST** be disclosed to the Chief Executive Officer and can only be undertaken with the approval of the company.

Consultants / Employees should also consider the impact that outside activities may have on their personal health, endurance, and job effectiveness. Dhalia holds all consultants / employees to the same standards of performance and scheduling demands, and cannot make exceptions for consultants / employees who are engaged in outside activities.

It is therefore not permissible to carry out additional works for clients such as; finishing of properties or purchases of goods or services.

12.0 GIFTS AND GRATUITIES

As a Dhalia consultant / employee, you must not solicit or accept from any interested party any gratuity or other thing of value for yourself or your family, friends, and associates when such behavior could affect, or reasonably be interpreted by others as affecting, your impartiality as a representative of Dhalia. You should be particularly careful not to place yourself in the position of accepting a gratuity when you are involved in any phase of sales negotiation.

13.0 INTERNAL HARDWARE

Misuse of, or damage to company property is considered unacceptable and such persons or branches are accountable. Such action is considered to be gross misconduct and damages will be deducted from pending commissions.

Office computers are to be used solely for office/business use – no external CD's / USB memory sticks or any other devices are to be inserted into the terminals without prior permission. No software is to be downloaded onto any terminal without prior permission.

Digital cameras in particular are expensive and delicate objects and must never be kept overnight unless authorized by your branch manager.

The Chief Executive Office reserves the right to monitor emails and personal activity on the internet if deemed necessary.

14.0 E-MAIL ENQUIRIES

All e-mail enquiries are automatically and immediately acknowledged. However, you are expected to reply to an enquiry within 24 hrs.

15.0 APPEARANCE - PRESENTING YOURSELF IN A PROFESSIONAL WAY

As Dhalia has a brand reputation to uphold and constantly present itself as a serious professional organisation then all consultants and office employees are expected at all times to present a professional, business-like image to customers, prospects, and the public.

Radical departures from conventional business-casual dress code or personal grooming and hygiene standards are not permitted.

Business casual is a style of dressing that is neat and comfortable while maintaining professionalism.

Just because the term "casual" is used to define the dress code that does not mean that your appearance should be casual. It is important to be well-groomed and to have a neat and clean appearance at work.

Office workers and all consultants who have regular contact with the public must comply with the following personal appearance standards:

- (a) Office employees and consultants are expected to dress in a manner that is appropriate for a professional organisation.
- (b) Clothes are to be clean, pressed and fit properly
- (c) Office employees and consultants should not wear jeans, athletic clothing, shorts, bermudas, suggestive attire, T-shirts, baseball hats, and similar items of casual attire that do not present a business-like appearance.
- (d) Any clothing that has words, terms, or pictures that may be offensive to other employees is unacceptable.
- (e) Hair should be clean, combed, and neatly trimmed or arranged. Shaggy, unkempt hair is not permissible regardless of length.
- (f) Shoes are to be clean, polished, and in good condition.
- (g) Conservative walking shoes, dress shoes, oxfords, loafers, boots, flats, smart sandals (women only) and backless shoes are acceptable for work. Not wearing stockings or socks is inappropriate for the winter months. Athletic shoes, tennis shoes, thongs, flip-flops, slippers and any casual shoe are not acceptable
- (h) Nails to be clean and tidy
- (i) No odors in clothes. Don't smell like smoke.
- (j) While tattoos are a matter of personal choice, management has made the decision that tattoos should be covered while performing the duties of your job at Dhalia. Tattoos and body piercings (other than on women) should not be visible with an exception being made for those who have a single small tattoo on the arm, lower leg or foot. Full arm or leg tattoos should be covered at all times – summer and winter
- (k) Body piercing is only acceptable on women and tolerable to the ears and only studs (no rings) for the nose.

15.1 Specific appearance code for men:

- A white or solid coloured dress shirt is the preferred attire. This must be a collared shirt and always tucked into trousers.
- No patterned or gaudy coloured shirts. Avoid anything bright or bold.
- A long-sleeve dress shirt is more professional than a short sleeved one, however there is no restriction on short sleeved shirts
- A collared polo shirt is also acceptable in the summer months
- Smart and pressed trousers (cotton trousers are always good)
- Matching business looking jacket (when necessary)
- Dark socks (Navy, black or gray) - A calf length sock is always a smart choice.
- Smart leather belt
- Short neat hair
- Sideburns, moustaches, and beards should be neatly trimmed or clean shaven
- No jewellery (other than wedding / signet ring and watch)
- No earrings
- Tasteful, professional tie (if needed)

- Avoid overusing cologne or body sprays.

Try to look as well-put together as possible. You want to achieve a professional and polished look.

15.2 Specific appearance code for Women

- Dresses, two piece dresses (with coordinated jacket), knee length or just above the knee skirts, skirts with jackets, dressy two-piece knit suits or sets, and skirts that are split at or below the knee as well as smart trousers, smart tops or tailored shirts or blouses are acceptable. They must be paired with appropriate accessories. Scarves, belts, and jewellery are encouraged. Jewellery should be worn in good taste and must be discrete.
- Dress and skirt length should be at a length at which you can sit comfortably in public.
- Tight fitting, sheer or suggestive (revealing) clothing, cleavage, sleeveless clothing, tank tops; midriff tops, halter tops, tops with bare shoulders or plunging necklines, short, tight skirts that ride halfway up the thigh are inappropriate for work.
- Mini-skirts, clothing with excessive frills or ruffles, sun dresses, beach dresses, and spaghetti-strap dresses are also inappropriate.
- Shoes that have two- or three-inch heels are fine, but you don't want to go any higher than that. Shoes with four-inch or higher heels look out of place in a business environment.
- Basic makeup is recommended, but excessive makeup is unprofessional.
- Avoid extremes of nail length and polish color,
- No more than two earrings per ear may be worn while performing the duties of your job
- Perfume or cologne should be used sparingly or not at all

Office employees who do not regularly meet the public should follow similar basic requirements and should still be as neat and business-like as working conditions permit.

At its discretion, the company may allow employees to dress in a more casual fashion than is normally required. On these occasions, employees are still expected to present a neat appearance and are not permitted to wear ripped or untidy and scruffy clothing, athletic wear, or similarly inappropriate clothing.

Any employee or consultant who does not meet the standards of this policy will be required to take corrective action, which may include leaving the premises to change attire.

15.3 Wearing Uniforms

Certain employees may be required to meet special dress, grooming, and hygiene standards, such as wearing uniforms, depending on the nature of their job. Employees who are required to wear uniforms (Manager Assistants and Head Office Staff) are to ensure that the full uniform is worn at all times.

16.0 DRUG AND ALCOHOL POLICY

Dhalia realizes that the misuse of drugs and alcohol impairs consultant / employee health and productivity. Drug and alcohol problems result in unsafe working conditions for all consultants / employees and customers. Dhalia is committed to maintaining a productive, safe, and healthy work environment, free of unauthorized drug and alcohol use.

Any employee involved in the unlawful use, sale, manufacturing, dispensing or possession of controlled substances, illicit drugs and alcohol on Dhalia premises or work sites, or working under the influence of such substances, will be subject to disciplinary action up to and including dismissal and referral for prosecution.

17.0 SAFETY POLICY

Dhalia is sincerely interested in the safety and well-being of its consultants / employees. Dhalia will make every effort to keep the office equipment in excellent condition and make sure that all safety devices are working properly.

If, in spite of our efforts to ensure safe working conditions, a consultant / employee or customer has an accident or becomes ill on the job, this should be reported to the First-Aider and respective manager within the premises immediately who will see to it that prompt medical attention is provided.

17.1 DRIVING & VEHICLES

If your role within Dhalia requires you to drive your personal vehicle with the possibility of having Dhalia's clients with you in the vehicle then you are responsible to ensure that:

- You are in possession of a valid driving licence
- You have a valid road licence affixed on your vehicle
- Your vehicle has the necessary and valid Insurance cover as required by law
- You possess evidence that you are driving a well-maintained vehicle (last service report)
- It is also necessary to ensure that you maintain a clean car at all times; both internally and externally.
- You are to drive within the stipulated speed limits and will comply with all traffic regulations when clients are in your vehicle
- You are prohibited from using a motor-cycle with a client as a pillion rider.
- Do not use your mobile phone to make or take calls while driving unless you have a Bluetooth connection.
- Do not text while driving (Not only is it illegal but it's a safety measure too)

18.0 WORKPLACE SECURITY POLICY

Dhalia is committed to maintain a safe and secure workplace. In order to maintain a secure work environment, Dhalia strictly prohibits consultants / employees and visitors from bringing any dangerous products / substances on Company property.

Also, in order to ensure the safety and security of the workplace, Dhalia strictly prohibits violence or threatening behavior. Anyone who engages in any violence in the workplace or in threats of violence or threatening behavior is subject to disciplinary action, up to and including termination of employment. Dhalia may, as it deems appropriate, seek legal sanctions against violators.

Prohibited behavior includes but is not limited to hitting, shoving, sexual assault, attacks, stalking, verbal or non-verbal threats, electronically communicated threats or threatening behavior, vandalism, arson and possession, use or threatened use of a weapon of any type.

All consultants / employees have the responsibility to report threatening or violent behavior, whether that behavior is exhibited by a member of staff or a visitor.

Failure to comply with this policy will result in disciplinary action up to and including termination.

19.0 HARASSMENT

Harassment is a form of misconduct which undermines the integrity of the employment relationship. Specifically forbidden is harassment of a sexual, racial, ethnic, religious, disability or age related nature. No consultant / employee should be subjected to unsolicited and unwelcome conduct, either verbal or physical. Harassment is behavior which is not welcome, is personally offensive, weakens morale, and therefore interferes with our work effectiveness. Such conduct, whether committed by management or non-management personnel, is specifically prohibited. Any issue of harassment is to be reported to the HR Executive and dealt with in the appropriate manner.

19.1 Sexual harassment

This may include: offensive sexual flirtations, advances or propositions; verbal abuse of a sexual nature; graphic or degrading verbal comments about an individual or his or her physical appearance; the display of sexually suggestive objects, pictures or printed materials; sexual gestures and innuendos; or any other conduct which has the purpose or effect of creating an offensive work environment.

In addition, no one should imply or threaten that an applicant or consultant / employee's "cooperation" of a sexual nature (or refusal) will have any effect on the individual's engagement, assignment, compensation, advancement, career development or any other condition of employment. Any such actions will bring prompt and certain disciplinary action, including possible termination.

19.2 Racial, ethnic, religious, disability or age harassment

This may include: derogatory comments about a person's ethnic heritage, racial background, religious beliefs, disabilities or age; the display of objects or printed materials which are degrading to members of particular racial, ethnic, religious or age group, or persons with disabilities; racial, ethnic or religious slurs or name calling; the wearing of insignia supporting racist, religious or ethnic organizations.

20.0 SMOKING POLICY

Dhalia (as well as the Law) maintains a non-smoking policy within the offices.

It is also courteous to avoid smoking in your cars to the benefit of your clients or in the presence of clients wherever this may be.

21.0 ANTI-MONEY LAUNDERING POLICY

Dhalia is committed to remaining constantly vigilant to money laundering prevention and combating the financing of terrorism for the purpose of risk management (reputational risk, legal risk and regulatory risk) and serious crime prevention (social duty) and it will not allow its systems to be abused in furtherance of these crimes.

Dhalia will, at all times, endeavour to ensure the protection of its staff, and safeguard the organization and its reputation against the threat of money laundering and the funding of terrorist and criminal activities.

As an organization engaged in Real Estate transactions we are aware that we can play a key role in detecting money laundering and terrorism financing schemes because we are in direct contact with buyers and sellers and know our clients better than any other party in the transaction. We are therefore well placed to detect suspicious activities or to identify red flag indicators. These indicators could be:

General

- Client refuses or appears reluctant to provide information
- Inconsistencies in information provided by client
- Request is made for a transaction to be rushed with promises of providing information later
- An unusually large cash transaction
- Unwillingness to provide source of funds
- Explanation for business and/or amount involved is not credible
- Transaction having no apparent purpose or which makes no obvious financial sense, or which seems to involve unnecessary complexity
- Unnecessary routing of funds through third parties
- Unrealistic wealth compared to client profile

General (Existing Clients)

- Transaction is different from the normal business of the client
- Size or frequency of activity or transaction is not consistent with the normal activities of the client
- Pattern of transactions has changed since the business relationship was established
- Money transfers to high-risk jurisdictions without reasonable explanation (not consistent with client's usual foreign business dealings)
- Sudden increases in the frequency or value of transactions of a particular customer without reasonable explanation
- Movement of funds that give rise to a loss or lower rate of return without any visible compensating benefit

Data Discrepancies

- Difference in apparent wealth & reported incomes
- Price manipulation - when a price is being escalated to manipulate price of property/transaction
- Under-declaration of the actual price of property

Individual character / behaviour

- Purchaser inadequately explains last minute substitution of the purchasing party's name
- Where a person appears to be acting as an agent for an undisclosed person and is reluctant to provide information about this person
- Where a person does not appear to be sufficiently knowledgeable about the purpose or use of the real estate being purchased.

Financial Analysis

- Use of significant amount of cash to purchase real estate property (may be combined with unusual advanced payments)
- A prospective buyer is paying with funds from a high-risk country
- Seller requests the proceeds of sale to be sent to a high-risk jurisdiction

Business Operation & Documents

- Where suspicious documentation for verification is provided
- Where the prospective purchaser has documents reflecting something other than the true nature of the transaction
- Destruction of records

Dhalia has an appointed Money Laundering Reporting Officer (MLRO). This role requires the MLRO to maintain controls and procedures aimed at deterring criminal elements from using the products and services of Dhalia and will evaluate Unusual Transaction Reports (UTR), and, following an investigation, determine as to whether a report is to be filed with the Regulatory law enforcement agency. Any cases of suspected money laundering is to be reported to the MLRO.

22.0 SICK LEAVE

When a consultant / employee is sick, s/he is to call his/her branch Manager Assistant and direct manager, before 0900hrs. The branch Manager Assistant is to send an email to the Finance Department and the Human Resource Department.

22.1 Payroll employees

It is at the Company's discretion to determine if a company doctor will be sent to examine the sick person. When returning to work s/he needs to provide the Finance Department with a Doctor's certificate covering every day within the sick leave period.

23.0 VACATION LEAVE DATES

Leave is to be applied for no less than **2 (two) weeks** prior to the requested leave in the case of requesting 1 (one) one week or more. Anyone requesting 2 (two) to 4 (four) days leave should apply no less than **1 (one) week** in advance. Those who require a day or a half day off is to preferably do so no less than **3 working days** prior to the

requested leave. Leave is applied for by entering the website: <https://indigo.shireburn.com/home> and creating a new leave request stating the days of leave or variable leave (minimum leave in hours is 4). It should be approved online by the branch manager. If leave is disapproved a question mark will keep appearing beside your request. Employees are not allowed to accumulate vacation leave from year-to-year.

Consequently, it is important for employees to take vacation time off during the year it is due. The company will only allow extensions of leave until January of the following calendar year (subject to approval by the Chief Executive Officer). Vacation time off not taken until this time will be forfeited. We do not want this to happen. Consequently, we encourage you to plan ahead to make the best possible use of your vacation time off.

It is at management's discretion to decide if it will allow exceptions to this policy depending on the employees' specific needs and the exigencies of the company.

24.0 DISMISSAL OR TERMINATION

Only the Chief Executive Officer or his designated representative may dismiss a consultant / employee. If a Branch Managers wishes to dismiss a consultant / employee in his/her branch then s/he is to inform Head Office and communicate with the HR Manager and the Chief Executive Officer. Anyone wishing to resign from his/her role may do so in writing directly to his / her direct manager and copied to the Human Resource Department and Chief Executive Officer. Payroll employees will observe legal requirements applicable to notice periods.

25.0 HANDLING CLIENTS

Dhalia works on a Customer first principle and all customers will be treated with respect at all times.

25.1 Client Problem

When a problem occurs with a client – the problem is to be discussed with the employee's direct manager and Head Office as necessary.

25.2 COMPLAINTS AND GRIEVANCES

Often, the best way to resolve a problem is through direct conversation between the consultant / employee and direct manager. This can prevent small issues from growing into large misunderstandings or problems. The confidentiality of individual consultant / employees' concerns is maintained unless the involvement of others is necessary to resolve the problem or unless the problem is of a nature that, by law, others must be involved.

26.0 EQUAL EMPLOYMENT

It is the policy of Dhalia to provide equal opportunity for all qualified persons and not discriminate against any consultant / employee or applicant for employment because of race, color, religion, sex, age, national origin, disability, or any other protected status in accordance to local legislation.

This policy applies to recruitment and placement, promotion, training, transfer, retention, rate of pay and all other details and conditions of employment.

Employment and promotion decisions will be based on merit and the principle of furthering equal opportunity. The requirements we impose in filling a position will be those that validly relate to the job performance required.

All other personnel actions including compensation, benefits, transfers, layoffs, recalls from lay-offs, training, education, tuition assistance and recreation programs will be administered without discrimination.

27.0 PROBATION PERIOD

All new employees / consultants undergo a probationary period that begins on the first day of employment. The probationary period is the initial period of employment, a kind of “trial period”, during which the Management carefully considers whether the consultant / employee is able to meet the standards and expectations of the job and if the consultant / employee should be retained by Dhalia as a “regular” consultant / employee (the probationary period does not apply to transfer employees). During this time, the manager appraises the consultant / employee’s:

- Ability to learn and perform job duties
- Quality of work
- Productivity
- Work habits
- Cooperation
- Attendance
- Punctuality
- Other standards and expectations specific to the employee’s work situation

If the consultant / employee is clearly not meeting the requirements of the job, the consultant / employee may be released at any time during the probationary period.

The trial period for consultants is normally estimated at 90 days, while for payroll employees this follows legal requirements of 6 months, however if employed in a managerial grade, probation is 1 year.

28.0 WAGES AND SALARIES

Dhalia continuously tries to recognize the relative values of various jobs; to adopt realistic wage and salary ranges for those jobs; and to make comparative studies of national and of academic wage rates and changing job conditions to assure that the wage and classification structure is current. Dhalia reviews employees’ salaries and may recommend appropriate pay levels periodically. Wages & Salaries are determined on an individual basis. Commissions for consultants will be in line with industry standards.

29.0 PERSONNEL RECORDS

The Human Resources Department maintains records of each employee's / consultants address, telephone number, emergency contacts, benefits, photograph, contract, appraisals, vacation leave, sick leave, training, awards and any other relevant document / data. Employee and consultant personal data is protected by the Data Protection Act of Malta.

It is the employee's / consultant's responsibility to keep Dhalia up to date regarding any changes in personal details.

30.0 CAREER AND PERSONAL GROWTH

30.1 Staff Education & Career Development

Dhalia offers a variety of staff development programs.

Many of these programs are open to all Dhalia consultants / employees and are announced through various emails. Consultants / Employees may take approved outside courses in their specific fields to increase their professional knowledge and career potential.

Consultants / Employees are encouraged to discuss their career goals and plans with the HR Executive and seek prior Head Office authorization for any external training.

31.0 BUSINESS EXPENSE REIMBURSEMENT

The company will reimburse employees for expenses which are directly business related provided an agreement on these expenses is arranged before being incurred. These include: travel expenses, office supplies, and mileage incurred while traveling on business for certain categories of staff. Consultants / Employees must submit receipts for all expenses where applicable. Consultants / Employees should consult with their manager prior to business trips to confirm eligible expenses.

32.0 AWARDS

Dhalia recognizes the hard work that consultants and managers put into their work and as a demonstration of this has approved the following annual awards:

- Manager's Assistant Award
- Brand Ambassador Award
- Most promising newcomer
- Top Contributor to the Inventory

- Top Letting Consultant
- Top Number of Sales
- Top Manager
- Top Sales Consultant

Occasionally we may also include a "Chairman's Award for Excellence" awarded to a person who would have shown exceptional achievement throughout the previous year.

33.0 TERMINATIONS AND EXIT INTERVIEWS

Employees whose terminations are initiated by Dhalia will be given notice consistent with the terms of their separation and according to local legislation. Consultants may be asked to terminate their position with immediate effect.

Exit Interviews: In an effort to gather information regarding the workplace experiences of regular consultants / employees who voluntarily choose to leave Dhalia, Human Resources will attempt to schedule an exit interview. Consultants / Employees who are discharged may also request an exit interview with Human Resources. Exit interviews are not mandatory but are considered an important way to identify how Dhalia can maintain a positive and productive environment for its consultants / employees.

34.0 DATA PROTECTION

All personal information will be held by Dhalia Real Estate Services Ltd for a period of up to 5 years after termination of Agreement for all "Memorandum of Understanding" Agreements signed with Branch managers and / or Sales / Letting Consultants. For all contracts of employment, Dhalia will abide by current legislation requirements. Personal data will be held for the sole purpose of internal records, statistics, payroll, tax, National Insurance, VAT or any other government related need. Dhalia Real Estate Services Ltd declares that it will not disseminate any personal information to third parties without explicit individual consent.

All Dhalia employees / consultants are requested to sign our Acceptable Use GDPR policies.

35.0 COMPLAINT & APPEAL POLICY

Any student attending the Training Academy wishing to file a complaint against any part of the training program, whether logistic, materials used or tutor concerned, should send the complaint in writing to the HR Department. The HR department will immediately investigate and handle the complaint, and reverts with any feedback and / or decisions to the student concerned. If the student is still not satisfied, an appeal can be filed with the Head of the Academy / CEO.

36.0 DHALIA QUALITY POLICY

Dhalia believes that its market expects a continually improving service. We aim to continually improve the service we provide to meet our clients' requirements and to provide services that we can justifiably be proud of. Only by providing an outstanding service and product quality will we achieve our aims of long-term success and sustained improvements.

Our Quality Policy is defined and strongly driven by the following management principles and behaviours:

- Build a mutually profitable relationship with our customers, ensuring their long-term success, through the understanding of their needs and the needs of their customers as well
- Achieve our commitments for quality, cost, and schedule
- Enhance the systematic research and use of best preventive practices at all levels and ensure reliable risk management
- Drive continual improvement and innovation based upon efficient business processes, well-defined measurements, best practices, and customer surveys
- Develop staff competencies, creativity, empowerment and accountability through appropriate development programs and show strong management involvement and commitment

All personnel within the company are responsible for the quality of their work. The company provides training and has established systems to assist all personnel to achieve the standards required. While we endeavour to offer a service that we can be proud of, we have to recognise that we don't always achieve our own standards. When a customer complains, we are committed to investigating the complaint and will do our best to put right all justified complaints.

Dhalia strives to be the best provider of real estate services in the industry. Through the use of these guiding principles, everyone in Dhalia is accountable for fully satisfying our customers by meeting or exceeding their needs and expectations with best-in-class solutions and services. Our goal is 100% customer satisfaction 100% of the time.

37.0 POLICY REVISION

This handbook has presented a brief overview of personnel policies established to help you in your job. It is not intended as a formal or exhaustive statement of an consultant / employee's rights and responsibilities, or as a contract of employment. It is simply a summary of Dhalia's current policies, rules, procedures and benefits. Our past flexibility in making changes in these areas has resulted in continuing improvement in working conditions and benefits for all of our employees over the years. We feel very strongly that we must retain that flexibility to meet future economic challenges.

Accordingly, the management reserves the right to amend, modify and/or eliminate any of these policies, rules, procedures and benefits at its discretion.

Since this handbook is a summary of our basic policies, rules, procedures and benefits, we have attempted to minimize the use of legal and technical language to make each section as simple and understandable as possible. It is up to you to notify us if you have a concern or question about your employment / engagement responsibilities.

The Human Resource Executive with the approval of the Chief Executive Officer is responsible for updating the working policies from time to time. All members of staff accept the working policies and agree that they are regulated by the policies and working conditions.

Dhalia Real Estate Services

Corporate Social Responsibility Policy

“Dhalia Cares”



Version 1 – January 2019

CSR Policy:

**For questions or comments regarding this Policy Document or
for requests to update it contact the
Human Resource Department**

This Policy Document is the property of Dhalia Real Estate

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1.0 Our Principles

At Dhalia we value the principles of accountability, honesty and integrity in all aspects of our business. Our policy is to conduct our business in a manner which ensures:

- fair treatment of all employees and clients
- transparency of our business policies and practices
- high standards in all matters relating to health, safety and the environment
- ethical business practices throughout our operations

We recognise that the involvement of our consultants and employees is key to the future success of the business and we have adopted a policy of keeping employees fully informed on all matters affecting them. We have consistently operated a remuneration strategy that recognises individual performance. We are also committed to training, recognising the role this plays in attracting and retaining staff. To succeed in delivering the best possible service to our clients, every consultant and employee is expected to adhere to the Company's core values and to uphold them in the workplace. Employees are expected at all times, to exercise the highest ethical judgement and comply with laws applicable to their duties.

At Dhalia, we define Corporate Social Responsibility as follows:

- Conducting business in a socially responsible and ethical manner;
- Protecting the environment and the safety of people;
- Supporting human rights; and
- Engaging, learning from, respecting and supporting the people with whom we work.
- Engaging with society through our "Dhalia Cares" brand and initiatives

Dhalia will ensure that all matters of Corporate Social Responsibility are considered and supported in its operations and administrative matters and are consistent with Dhalia stakeholders' best interests.

All Dhalia consultants, employees and contractors will adopt the Corporate Social Responsibility considerations described in this policy into their day-to-day work activities.

Dhalia managers will act as role models by incorporating those considerations into decision-making in all business activities.

Dhalia will ensure that appropriate organizational structures are in place to effectively identify, monitor, and manage Corporate Social Responsibility issues and performance relevant to the business.

This Policy is built on the following areas that reflect existing and emerging standards of Corporate Social Responsibility:

2.0 Business Ethics and Transparency

Dhalia is committed to maintaining the highest standards of integrity and corporate governance practices in order to maintain excellence in its daily operations, and to promote confidence in our governance systems.

Dhalia will conduct its business in an open, honest, and ethical manner.

Dhalia recognizes the importance of protecting all of its human, financial, physical, informational, social, environmental, and reputational assets.

Dhalia will advise its partners, contractors, and suppliers of its Corporate Social Responsibility Policy, and will work with them to achieve consistency with this policy.

Dhalia is committed to measuring, auditing and reporting performance on its Corporate Social Responsibility programs.

3.0 Environment Health & Safety

Dhalia is committed to protecting the health and safety of all individuals affected by its activities, including consultants, employees, contractors and the public.

Dhalia will provide a safe and healthy working environment, and will not compromise the health and safety of any individual.

Dhalia is committed to environmental protection and stewardship. It is our goal to promote responsible environmental practices and continuous improvement.

Dhalia recognizes that pollution prevention, biodiversity and resource conservation are key to a sustainable environment, and will effectively integrate these concepts into its business decision-making.

All employees are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

4.0 Stakeholder Relations

Dhalia will engage stakeholders clearly, honestly, and respectfully.

Dhalia is committed to timely and meaningful dialogue with all stakeholders, including shareholders, customers, consultants and employees, government, developers, contractors, architects, notaries & lawyers, regulators, and landlords among others.

5.0 Employee Relations

Dhalia will ensure that employees are treated fairly and with dignity and pay due consideration for their goals and aspirations and that diversity in the workplace is embraced.

Dhalia will apply fair labour practices, while respecting the national laws.

Dhalia is committed to providing equal opportunity in all aspects of employment and will not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment.

6.0 Human Rights

Dhalia recognizes that governments have the primary responsibility to promote and protect human rights.

Dhalia will work with governments and agencies to support and respect human rights within our sphere of influence.

Dhalia will not tolerate human rights abuses, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.

Dhalia will always strive to build trust, deliver mutual advantage and demonstrate respect for human dignity and rights in all relationships it enters into.

7.0 Charitable Donations through Dhalia Cares

As part of the Dhalia Cares initiatives, the Board allocate financial resources as donations towards various charities throughout the year. Employees and consultants are also encouraged to engage in such donations on a voluntary basis towards the various initiatives determined by the Dhalia Cares team.

Dhalia's active involvement in charitable work creates a channel for feedback on the Company's activities which helps to shape policy in this area.

8.0 Dhalia Cares – Hands-on Initiatives

Apart from charitable donations, employees and consultants are encouraged to actively participate in a number of hands-on initiatives organised by the Dhalia Cares team throughout the year to support those less fortunate and/or protect the environment.

9.0 Communicating the Policy

All employees are informed of the policy and are encouraged to contribute to the achievement of its objectives. The Policy is published internally on the Intranet as well as through internal structures. A general overview is also included in the staff induction programme and employees are encouraged to provide feedback and suggestions.

10.0 Environmental Policy

The Company aims to:

- minimise the environmental impacts of our existing operations and ensure that the environmental impacts of new operations are fully assessed and minimised prior to their introduction;
- reduce consumption of materials in all operations, where practicable, to re-use rather than dispose of materials where possible, and promote recycling and use of recycled materials;
- seek to improve the energy efficiency of buildings and to manage energy wisely in all operations;
- reduce, wherever practicable, the level of harmful emissions from our office premises;
- introduce programmes that aim to minimise waste;
- dispose of waste and effluents in a responsible manner;
- promote the ownership and control of environmental issues at business level.
- provide the necessary training and support in order to ensure that staff fulfil their requirements;
- work with our suppliers to minimise the impact of their operations on the environment through a quality purchasing policy;
- support through our community programme the promotion of environmental protection by relevant external groups and organisations;
- monitor progress and publish an environmental performance report on an annual basis

10.1 Energy

Dhalia aims to reduce the consumption of energy and will also strive to ensure that its office premises use energy in as efficient a manner as possible. Energy is used for office lighting, heating and cooling systems and for the operation of office equipment and kitchen appliances. Solar panels are installed in offices where possible.

10.2 Lighting

Dhalia will encourage the use of low energy lighting and where practicable, the use of segmented areas which will allow lights to be switched off when not required. Likewise Dhalia will encourage the use of manual and passive infra-red switches where practicable.

10.3 Heating

To make more efficient use of heating systems Dhalia will ensure that the temperature is set for a comfortable working environment and not more than 22C.

10.4 Air conditioning

Air conditioning units are available in all of Dhalia's office locations. These will only be used when required and will be switched off when the office is not in use.

10.5 Kitchen appliances

Dhalia will aim to ensure that its kitchen appliances are energy efficient and that they release the minimum amount of waste product.

10.6 Paper

Dhalia seeks to reduce the amount of paper used and to increase the amount of paper that is recycled. Processes will be automated and digitized where possible. Dhalia will strive to reduce the amount of paper purchased and will encourage staff to re-use or recycle paper. Where possible, documents will be printed on recyclable and chlorine free paper. In addition, staff is encouraged to make use of electronic communications in the form of email and the scanning of documents into electronic records for storage.

11.0 Waste

General office waste is collected and removed each day by cleaners and removed by a waste contractor.

Redundant computers and IT equipment are donated to charitable organisations whenever possible.

Redundant equipment, which is not sold or given to a charity, will be disposed/ recycled in a manner that is environmentally friendly and adheres to EU regulations.

12.0 Hazardous materials

Dhalia will accept responsibility for monitoring hazardous materials found in the office, including, for example asbestos, polychlorinated biphenyls (“PCB’s”) and refrigerants to ensure that they do not pose a risk to employees or customers.

Dhalia will ensure that annual service and maintenance programmes for its air conditioning plants are carried out, as required under current guidelines.

13.0 Transport

The company recognizes that transport is an essential part of its business. Consultants are encouraged to purchase energy efficient vehicles with low CO2 emissions and to use their vehicles effectively.